

**PROPOSED RESTRICTED ROADS (20MPH LIMIT) (SCOTLAND) BILL
MARK RUSKELL MSP**

SUMMARY OF CONSULTATION RESPONSES

This document summarises and analyses the responses to a consultation exercise carried out on the above proposal.

The background to the proposal is set out in section 1, while section 2 gives an overview of the respondents. A detailed analysis of the responses to the consultation questions is given in section 3. These three sections have been prepared by the Scottish Parliament's Non-Government Bills Unit (NGBU). Section 4 has been prepared by Mark Ruskell MSP and includes his commentary on the results of the consultation.

Where respondents have requested that certain information be treated as confidential, or that the response remain anonymous, these requests have been respected in this summary.

In some places, the summary includes quantitative data about responses, including numbers and proportions of respondents who have indicated support for, or opposition to, the proposal (or particular aspects of it). In interpreting this data, it should be borne in mind that respondents are self-selecting and it should not be assumed that their individual or collective views are representative of wider stakeholder or public opinion. The principal aim of the document is to identify the main points made by respondents, giving weight in particular to those supported by arguments and evidence and those from respondents with relevant experience and expertise. A consultation is not an opinion poll, and the best arguments may not be those that obtain majority support.

Copies of the individual responses are available on the following website <https://greens.scot/safer-streets/responses>.

Online responses have been given an identification (ID) number which is automatically assigned by Smart Survey, the online data collection tool. Alternatively, those who submitted information in writing are allocated a written response (WR) number.

Because of the volume of responses received, an index of all individual respondents has not been included with the summary, but is being made available on the Scottish Green Party website. In addition, a list of organisations which responded is set out in Annexe B to the summary.

SECTION 1: INTRODUCTION AND BACKGROUND

Mark Ruskell MSP's draft proposal, lodged on 12 May 2017, is for a Bill to replace the current 30mph default speed limit on restricted roads with a 20mph limit.

The proposal was accompanied by a consultation document, prepared with the assistance of NGBU. This document was published on the Parliament's website, from where it remains accessible:

<http://www.scottish.parliament.uk/parliamentarybusiness/Bills/104723.aspx>.

The consultation period ran until 15 September 2017. The initial closing date was 7 August 2017 but was extended due to the level of interest of potential respondents and to give more time for agencies which might not meet in summer to draw together responses.

Many organisations and individuals were sent copies of the consultation document or links to it by the member, including—

- the Convention of Scottish Local Authorities (COSLA) and to local authorities themselves;
- community councils;
- Transport Scotland and road safety agencies;
- police and legal organisations;
- health agencies and emergency services;
- cycling charities and representative bodies;
- transport organisations and representative bodies;
- other agencies concerned with road use;
- equalities organisations, charities, and campaign groups; and
- parent councils of schools.

A press conference was hosted at the Scottish Parliament to launch the consultation to which national news organisations across Scotland were invited. The consultation was also shared extensively across social media networks and via press releases to local papers.

The consultation exercise was run by Mark Ruskell MSP's parliamentary office.

The consultation process is part of the procedure that MSPs must follow in order to obtain the right to introduce a Member's Bill. Further information about the procedure can be found in the Parliament's standing orders (see Rule 9.14) and in the *Guidance on Public Bills*, both of which are available on the Parliament's website:

- Standing orders (Chapter 9):
<http://www.scottish.parliament.uk/parliamentarybusiness/26514.aspx>
- Guidance (Part 3):
<http://www.scottish.parliament.uk/parliamentarybusiness/Bills/25690.aspx>

SECTION 2: OVERVIEW OF RESPONDENTS

This section and section 3 summarise the 1,354 unique responses to the consultation that were received from individuals or organisations.

Of these, 1,265 responses were submitted via an online survey tool created by the Non-Government Bills Unit. The remaining 89 were provided separately to NGBU by the MSP's office.

Friends of the Earth Scotland and the Scottish Green Party each created an online tool to encourage individuals to indicate support for the proposal in the form of an email populated by pre-prepared answers to the consultation questions. Of the emails received in this way, 1,090 consisted entirely of the pre-prepared text, and these have not been separately counted towards the total number of responses used in this summary. The text of those responses is set out in Annexe A. However, where individuals used the Friends of the Earth or Scottish Green Party online tool to express an individual view (supplementing or replacing the pre-prepared text), their responses have been counted among the 89 referred to above.

Of the 1,354 responses—

- 1,130 (83%) were from individuals; and
- 223 (16%) were from organisations.

Of the individuals—

- 1,032 (91%) were members of the public;
- 83 (7%) were professionals with experience in a relevant subject; and
- 12 (1%) were academics with expertise in a relevant subject.

Of the organisations—

- 48 (21%) were public sector organisations including 13 local authorities and 3 statutory health providers such as NHS Health Scotland;
- 4 (2%) were private sector organisations;
- 18 (8%) were representative organisations including the RAC, Scottish Cycling and the Alliance of British Drivers;
- 55 (24%) were third sector organisations comprising a number of campaigning organisations related to speed reduction and road users as well as other charitable concerns; and
- the remaining 100 (45%) included a large number of community councils and school parent councils.

Of the 1,354 responses—

- 607 (45%) agreed to have their responses attributed to them by name;
- 647 (48%) opted for anonymity (and are not named in this summary); and
- 100 (7%) asked for their responses to remain confidential (and their contents are not disclosed in this summary).

Overall, 891 respondents (66% – just under two-thirds) were fully or partially supportive, while 434 (32% – just under a third) were partially or fully opposed. If the 1,090 near-identical responses received via the Friends of the Earth and Scottish Green Party online tools – all of which were supportive – are included, 1,981 respondents (82%) supported the proposal, while 434 (18%) opposed it.

SECTION 3: RESPONSES TO CONSULTATION QUESTIONS

This section sets out an overview of responses to each question in the consultation document. The analysis is based on the 1354 online and written submissions, where relevant information is available, unless stated otherwise.

General aim of proposed Bill

The consultation document outlined the aim of the proposed Bill and what it would involve. Respondents were asked:

**Question 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?
Please explain the reasons for your response.**

All respondents were given the option of choosing one of six options – fully supportive, partially supportive, neutral, partially opposed, fully opposed and unsure.

Of the 1,354 responses—

- 891 (66%) were supportive, comprising 771 full and 120 partial support;
- 434 (32%) were opposed, comprising 361 in full and 73 in partial opposition to the proposal; and
- 15 respondents (1%) were neutral on the subject and 14 (1%) were unsure.

Individual respondents

- Of the 1,043 members of the public, 650 (62%) fully or partially supported the proposal while 366 (35%) fully or partially opposed the proposal.
- Of the 12 academics with expertise in a relevant field, eight were in full or partial support and four in full or partial opposition.
- Of the 81 professionals with expertise in a relevant field, 51 were in full or partial support and 30 full or partial opposition.

Organisational respondents

- Of the 224 organisations that responded, 181 (81%) were fully or partially supportive of the proposal and 34 (15%) were fully or partially opposed.
- Out of 41 public organisations, 32 gave full or partial support and five voiced full or partial opposition.
- The four commercial organisations divided equally into two for the proposal and two against.
- Of the 18 representative organisations, 12 gave full or partial support and six voiced full or partial opposition.
- A total of 50 third sector organisations responded of which 43 stated full or partial support and six stated full or partial opposition.

- Of 78 other organisations (clubs, local groups, groups of individuals, etc), 70 expressed full or partial support for the proposal and 6 voiced full or partial opposition.
- Thirteen local authorities responded, of which 10 fully or partially supported the proposal, two partially opposed and one neutral; 78 community councils and 47 parent councils in schools also responded.

A number of arguments, both in support of and opposition to the proposal, were echoed throughout the responses. This summary sets out the relevant arguments at the most apt points and does not seek to repeat points already made at earlier junctures.

A total of 1,171 respondents (86%) gave reasons for their answer to this question, and the reasons can be characterised as follows—

Safety considerations

Fatality and injury rates

Almost 40% of respondents explicitly cited an improvement in safety as the sole or main reason to support the proposal. It is also noteworthy that those supporting the proposal who didn't specifically cite safety as the central reason for support gave other reasons such as increases in active travel or more pleasant surroundings which were explicitly or implicitly predicated on the expectation of increased safety outcomes.

In the main, respondents supporting the proposal asserted a direct causal link between slower speeds and safer streets. A small number referred to research showing fewer fatalities and reduced severity of injuries at 20mph, pointing out that there is a “strong negative correlation between vehicle speed and deaths and severe injuries”. (ID 61960013, Dr Gordon Miller)

The general sense of those concerned with safety is summed up as “the huge reduction in death and injury risks when motor vehicles travel at 20mph compared to 30mph is sufficient justification for decreasing the speed limit in built up areas”. (ID 59705236 John Chivall).

“The impact of injury and fatal RTCs [road traffic collisions] to society is significant and on a daily basis RTCs across Scotland affect our communities. Road deaths are an obvious tragedy for the families involved. In addition, the cost of a fatal road accident in Scotland is £1.93 million, serious accidents £225,000 and minor accidents £22,500. Clearly a significant reduction in accidents or the severity of accidents would be welcome and assist the national aim ... to reduce the number of road accidents”. (9WR Angus Council)

"Several studies have demonstrated a link between the introduction of 20mph speed restrictions and a subsequent reduction in casualties. The risk of serious injury or death for people cycling (and for pedestrians) increases disproportionately as speed increases. A pedestrian hit at 40 mph has a 31% chance of death; if they are hit at

30mph, this falls to 7%; and at 20mph, the risk is negligible. Also, lowering the speed limit to 20mph has been shown to decrease the proportion of accidents involving children by as much as 70%. It is recognised that children cannot correctly judge the speed of traffic before the age of 12, and children living in areas of deprivation are more likely to be injured in road crashes". (17WR Cycling Scotland)

Conversely, a small number challenged the view that levels of safety would improve as a result of a 20mph limit, taking the view that the change would result in riskier driving practices which are covered in more detail in the Road Usage section of this question. A few respondents felt that reduced speed limits would create a fallacious sense of safety resulting in higher levels of risk-taking such as drivers pulling into smaller gaps and pedestrians crossing between cars in 20mph traffic.

"Risk homeostasis means that though traffic injuries will go down in the short term, they will revert to normal in the long term as people continue to take the risks they are comfortable with". (ID 59595586 Martin Page)

Research indicating that reduced speed directly results in fewer road fatalities was criticised as simplistic and not taking into account enforcement of current limits, car design, street lighting, safety education for drivers and tougher driving tests. The points were made that cars are not solely responsible for accidents and that "accident fatalities ignores the fact that only 12% of accidents are speed related". (ID 59731519 Anonymous)

Vulnerable road users

A recurring theme in a large number of responses, regardless of their position in supporting or opposing the proposal, was the additional safeguards a slower speed would afford vulnerable people. Improving safety for children, older people and people with disabilities was considered by many to be the main, or most significant, factor when responding. The safety of children, in particular, was a central theme for a large number of respondents, particularly those replying as parents or school parent council representatives.

"The proposed Bill is directly relevant to the State of Child Health Report 2017 call...to reduce the number of child deaths and for the implementation of a robust, consistent child death review system". (64WR The Royal College of Paediatrics and Child Health)

"I am concerned about my grandchildren's vulnerability to traffic danger as they walk, scoot or cycle to school and feel that they would be a lot safer if traffic went more slowly". (ID 59311653 Anonymous)

The beneficiaries of an improvement in safety were almost universally identified as pedestrians and cyclists. Many acknowledged that they chose not to walk or cycle solely because of perceived or actual danger and anticipated a sea change in safety as a result of a lower speed limit.

“It will make it safer for cyclists who use Scotland’s roads. It has been proven to be a safe speed limit with about 20% fewer casualties and 7-10 times fewer fatalities”. (ID 60039050 Scottish Cycling)

Concern over traffic travelling too fast is a significant barrier to cycling. Latest figures from the 2017 Annual Cycling Monitoring Report highlight that such a concern was stated by 11.5% of people as a reason for not cycling... The main source of collisions in built-up areas, with vehicles travelling up to 40mph, accounting for 88% of all collisions involving a bicycle where an injury is reported”. (17WR Cycling Scotland)

Road usage

Priority of road users

A culture of primacy of one road user over others was claimed by a small number of respondents, describing the proposal as an opportunity to “reclaim space from motorised vehicles”. (ID 61342074 Anonymous)

Summed up as “the priority of movement on the streets between pedestrians and wheeled traffic is unreasonably biased to the latter” (ID 58174951 Anonymous), the premise underpinning this point had four central themes - challenge the priority given to cars, reclaim the streets for residents, give parity of esteem to all road users and discourage car use.

The idea that “car is not king” (ID 60979288 Neil Beveridge) reflected a number of responses which made it clear they felt that neighbourhoods were inhibited by vehicular traffic and would benefit from the restrictions that a slower default speed is anticipated to bring. Better reaction times to avoid accidents, fewer concerns about safety and more use of the local space by local people were seen as some of the dividends.

Alternatively, those opposing the premise argued that too many concessions had already been made to other road users with drivers' needs a low priority.

“As a long suffering motorist, I think we already have far too many of these measures including: Cycle lanes, Speed bumps, Roads deliberately narrowed to impede the flow of traffic and Unnecessary traffic lights, whose sole purpose seems to be to create delays. We certainly don't need any more”. (ID 60062658 Scott Ronald)

“These proposals appear to be to assist cyclists taking over the roads from motorists. Motorists have to pay road tax, insurance and obey many laws... Make cyclists pay tax insurance then I will consider changing my view”. (ID 59045047 Scott Dunbar)

Shared road usage

A shared respect for all road users was also put forward. A number of cyclists described incidents of feeling unsafe on the road as a result of driver

behaviour or of others who are loath to take up cycling as a result of perceived danger from cars.

“We need to reclaim our urban spaces and allow all road users including those using footway, cycling and crossing the road to be safer and improve the environment”. (ID 57736992 Andrew Winter)

Finally, many felt that a lower speed limit resulted in a better level of tolerance and respect amongst all road users, and was “a sign of a people-centred city/country”. (ID 57942408 Daryl Tayar)

Crossings

Being able to cross the road safely was a significant issue for many respondents, reporting experiences crossing the road, most often with children, and the hazards and feeling of danger that vehicles driving at higher speeds brought. Many highlighted issues at school times and referred to accidents which had happened or stated that an accident felt inevitable.

Conversely, a few respondents made the case that pedestrians needed to be educated on the risks of the road when crossing.

Traffic

The issue of traffic split the responses fairly evenly and elements considered included volume, congestion, flow and the impact on journey times. A few felt that the ever-increasing volume of traffic was the nub of the problem which the proposal did not wholly address.

Those in favour of the proposal felt that traffic could flow better (albeit with changes to road management) with significantly less stop-start driving.

“Any impact on journey times would be minimal, since most traffic delays occur at junctions; moreover, the increase in cycle and walk trips would lead to fewer short car trips which would in turn reduce congestion”. (ID 59684036 Phil Jones Associates Ltd)

However, those opposed to the proposal cited experiences of 20mph zones currently in operation or how they anticipate the traffic will be impacted. In these instances, traffic operates at a crawl, limits are unnecessary as traffic never moves fast enough and congestion is significantly worsened. In particular, the lack of harmonisation of controls such as traffic lights were viewed as instrumental in slowing traffic flow.

In addition, some respondents anticipated increased travel times as a result of the reduction in speed limits. Public transport users described challenges in making connections from urban to local services and expected that timetables would have to be substantially altered with an impact on travel time.

Commercial vehicles

The impact of changed speed limits on commerce was considered with a view that slower speeds would “hamper the economy”, “increase driving time for those who drive for a living” and would be a “hindrance to business”.

“Where is the support for the businesses to supply jobs etc? It has caused issues with deliveries taking longer increasing carrier costs”. (ID 58812253 Mrs Fleming)

Conversely, some felt that a lower limit may be a detriment to businesses but that was not a reason in itself to oppose a speed reduction.

“They [local authorities] are also far too concerned about upsetting business people and the economy which may be affected by slightly longer journey times. This should not be the primary concern”. (ID 57670316 Anonymous)

It is noteworthy that four private companies responded to the consultation and they were evenly split in their opinion of the proposal.

A very small number of respondents noted the “increasing amount of commercial traffic”, road use during unsocial hours and changed habits of road usage as a result of increased local business activity. Others referred to the intrusiveness and feeling of intimidation when exposed to the noise and speed of large commercial vehicles. Responses highlighting these aspects often viewed a lower speed as a means of mitigation.

Driving concerns

A number of concerns affecting drivers were voiced, mostly by individual members of the public, and which broadly fall into three themed areas – attention and concentration, frustration, and confusion.

There was concern that a lower speed limit would affect attention and concentration, with disproportionate time checking the speedometer. It was also felt that drivers would be looking for speed limit signs and not focusing on the road. Others were concerned that low speeds meant that drivers could not maintain a level of concentration and would become distracted.

The argument was made that a default 20mph limit across a wide area results in diminished levels of safety in places where additional focus is required.

The second concern was that of frustration, with some respondents noting that it “is well documented that frustration causes accidents and increased rates of road rage”. (ID 58420791 Anonymous)

Some respondents had concerns about anger levels being elevated as a result of observing a lower speed limit. A few cited frustration as a causal link to increased number of accidents as a result of making riskier driving decisions such as speeding within the 20mph zones, speeding away from the reduced limit zone to make up for lost time, dangerous overtaking, avoiding

the restricted area altogether and not waiting for pedestrians to complete crossing the road. Others referred to the increased levels of impatience and aggression of other drivers impacting on those observing the limits.

A very small number disagreed with this and anticipated that a consistent 20mph limit will lead to less aggression on our roads.

Thirdly, a number of respondents, largely supportive of a default speed reduction, described the current piecemeal approach to limits as confusing and viewed this proposal as a solution to that issue. Others argued that “many towns/villages would have more areas where 30mph is appropriate so many speed changes signage could bring confusion and frustration”. (ID 61816682 Kinross Primary Parent Council)

Costs to car owners

Respondents detailed concerns such as cars not designed to run efficiently at lower speeds, higher revs leading to high emissions, wear and tear from changing gear more often and not being able to use cruise control at a low speed to manage compliance to limits. Poor fuel economy and the resulting additional motoring costs was also raised while a small number made the argument that modern technology decreased braking distances and collision prevention technology in cars already lessened impact damage in accidents.

“The proposal is seeking to amend exceptionally old legislation. The fact is that technology of vehicles has in fact improved meaning they are far more efficient in their ability to accelerate, brake and use fuel. As a result, vehicles are in fact more able than ever before to travel faster with greater safety than when this legislation came into being”. (ID 59228956 Anonymous)

Parking

A large number of respondents, regardless of their stance in supporting or opposing the proposal, were greatly vexed by parking. There was a sense that safety, road usage and traffic flow are all severely hampered by poor parking and that amelioration of that issue would help the proposal achieve its aims or, where the proposal was opposed, improve the driving experience.

Enforcement and observing limits

Enforcement

Enforcement was a regular theme in responses regardless of their position on the proposal. The arguments were differently nuanced with each answer but they covered the following—

- measures are meaningless without enforcement;
- current limits are not robustly enforced;
- cameras underpin successful traffic management and enforcement;
- a consistent, blanket approach assists enforcement;
- the proposal may be unenforceable, particularly with current resources;
- some acceptance that if a vehicle exceeds 20mph then it is still likely to be below 30mph; and

- fixed fines and points are a key enforcement tool.

It was consistently indicated that these elements were seen as key by respondents no matter which speed limit was decided upon.

"The single most important measure to ensure compliance with the new proposed speed limit is proper enforcement. This will require a commitment from Police Scotland to provide ADEQUATE resources for speed enforcement which they do not do at present. Unless there is a visible presence of roads policing officers properly enforcing this reduction, we consider that the effort will be wasted". (18WR Cycling UK Scotland)

Speeding

Many respondents considered the issue of tackling speeding to be the germane factor for consideration, describing their experience of drivers breaking the speed limit as part of their normal driving habits.

"The roads are a delight for motorists and motorcyclists who regularly exceed speed limits both through the village and on the roads between villages. The limit through the village is 30mph, and often seems to be simply ignored". (ID 57725025 Gerry Morrison)

Speeding in smaller villages and hamlets through which the main road runs was a reoccurring theme. Repeatedly, respondents reported the failure to observe the posted limits irrespective of whether it was 20mph or 30mph. Some commented that exceeding the limit is a socially acceptable practice and the hope that a more widely instituted 20mph would help change that.

"Drivers still drive far too fast through 'twenty's plenty' areas - taking insufficient account of the hazards of residential streets – parked cars, children crossing, pets on the loose, elderly residents etc. – all either obstructing the road or without the same level of awareness or ability to react to fast moving traffic. A global 20mph limit would, in my view, focus the minds of drivers as 20 would then be the 'norm' rather than the exception". (ID 58567250 Sarah-Jane McArthur)

A few respondents discussed the aspect that a 20mph limit may not be obeyed but would reduce the speeds below 30mph.

"Even if not fully observed, with some drivers travelling at 25mph, this is a big improvement on previous speeds of 45mph in a 30mph area. Like drink driving, we expect that speeding in 20mph areas will become much less socially acceptable". (ID 59788051 Killearn Community Council)

However, others took the view that this created an acceptance of transgression and should be dealt with by enforcing the 30mph limits.

There was concern that 20mph was much too slow to maintain and that a driver's speed could drift up and unintentionally breach limits.

“Reducing all 30mph speeds limits to 20mph will adversely affect law-abiding motorists who drive carefully, but do little to reduce inappropriate speed by drivers who habitually ignore speed limits”. (ID 57801324 Ken Cochran)

Separately, a number raised the issue of persistent and intentional speeding, describing drivers who used residential streets as short cuts, turning them into ‘rat runs’. The concern was that the speed limit is a moot point if speeders can disregard it with impunity.

Rules of the road

For those opposing the proposal, many focused on how the rules of the road impacted on reducing speed. In the main, it was felt that “driving to the conditions” was a more appropriate solution than imposing a lower limit. The thrust of this argument rested on two central tenets— firstly, that drivers should drive to the prevailing conditions and hazards rather than an imposed limit which does not take into account their surroundings at any given moment and secondly, that better road sense should be exercised by pedestrians supported by more and better road safety education.

“Dft [Department for Transport] research suggests that drivers take their speed cues from the road environment around them. Reducing the default speed limit will have no effect on the physical infrastructure. Roads that look and feel safe to drive along at 30 will remain exactly the same. In our view scare resources should be targeted at engineering and other physical improvements that make it clear that 20mph is the best speed to be driving at. Widespread enforcement of 20mph on already safe roads may lead to a loss of support for the measure when it is used in the correct locations”. (ID 63941623 IAM RoadSmart)

Wider health, environmental and societal considerations

Active travel and health outcomes

The impact of reduced speed limits as a step change in facilitating active travel, thus encouraging citizens to walk or cycle more regularly and having healthier lifestyles, was a key reason for supporting the proposal for many.

“Lower top speed for motorised traffic may increase modal shift to active travel particularly for short distances”. (ID 57724215 Anonymous)

The theme of better mental and physical health was referred to frequently within this topic with many seeing it as the natural result of improved active travel. In the main, respondents saw a linear argument where a slower driving speed resulted in being or feeling safer which in turn had a direct causal impact on active travel. The point was made by many that active travel has been inhibited to date because of perceived or actual danger.

“There is ... strong evidence that lowering traffic speed can encourage people to walk and cycle in urban settings. This measure would also contribute to allaying parental fears regarding their children walking to school. The health and economic benefits of increasing population levels of active travel are well documented. A review describing the potential effect of increased walking and cycling in urban England and Wales on the National Health Service (NHS) estimated a saving of approximately £17 billion through the reduced prevalence of diseases associated with physical inactivity”. (38WR Glasgow Centre for Population Health (GCPH) and NHS Greater Glasgow and Clyde (GGC))

“The current evidence related to introducing 20mph limits in restricted streets has identified positive health benefits for those populations seen as most vulnerable [including] reduced accidents amongst both young and elderly pedestrians and cyclists, especially in disadvantaged areas [and] reduced air pollution which affects the elderly and young children and those with respiratory disease”. (ID 63837097 NHS Health Scotland)

Finally, the financial and resource burden on the NHS resulting from accidents and the poorer health outcomes of a sedentary lifestyle was cited, with an expectation that slower speeds would result in fewer demands on the NHS.

Pollution

The topic of pollution brought out two opposing views. The larger number anticipated a reduction in vehicle exhaust emissions with the resulting dividends of better air quality and reduced noise pollution. Broadly speaking, those who expect a reduced level of pollution tended to include this element with a list of other anticipated benefits such as safety and better health.

On the other hand, some saw a lower speed limit creating more pollution. These respondents argued that slower speeds would create congestion and ‘stop-start’ conditions which would lead to less dispersion of pollutants, that changing gear or driving in lower gears produces more exhaust fumes and that modern cars are not built to perform efficiently at this speed which will lead to more emissions.

“Modern vehicles are fitted with devices to help reduce NO_x, CO₂, etc they need to operate at the required temperature to work effectively, travelling at slow speed will not allow this to perform correctly”. (ID 58799497 Anonymous)

A number of respondents equated a lower speed limit with a reduction in noise pollution and welcomed this improvement.

“If Scotland is serious about mental health it has to be serious about noise, disturbed sleep and mechanical intrusion into personal space”. (ID 57942612 Alan McLeod)

Quality of life

Pleasant surroundings, “liveability”, enhanced lives, improved quality of life and a reduction in stress were cited as outcomes of reduced speed and were linked closely with the anticipated increase in active travel and safety.

“Slowing the traffic down on all residential streets would hugely enhance quality of life in my neighbourhood, making this a happier place to be. It would make walking along the streets a more pleasant experience and encourage people to use the streets” (ID 62423996 Anonymous)

Deprivation

Some saw a reduction to 20mph as a means to address deprivation, positing the view that those living in areas of need are disproportionately affected by higher speed limits.

“Proposals for Scotland-wide implementation of 20mph will share health benefits of cycling more equitably across Scotland, and may reduce health inequalities. For example, the most affluent decile are currently three times more likely to cycle than the most deprived in Glasgow. Universally applied 20mph limits on restricted roads will reduce the problem of new infrastructure being built where there are existing high levels of cycling, which tends to benefit more affluent populations. Rather than people benefiting only from proximity to new infrastructure, this proposal more equally distributes incentives to cycle and the associated improvements to health”. (77WR Sustrans)

“Road use is socially-unequal. More people are killed and injured in areas of deprivation than in more well-off areas. Partly this is to do with access to cars and public transport, partly to do with amount of care that drivers take in different areas. Therefore, lower speeds address social inequality”. (ID 58409875 Anonymous)

Respondents spoke of car ownership as the purview of the affluent and the lack of enforcement in lower income areas.

“The option to retain 30mph limits on “main thoroughfares” does not tie with the ‘greater equality’ aim, as often poorer housing and schools in more deprived areas are located in these main thoroughfares, with more expensive housing in suburbs away from busier roads”. (ID 58847690 Louise Brown)

Operational, planning and administrative concerns

Setting speed limits – a set reduction

A large number supported, without qualification or comment, the proposal to reset the current default national speed limit from 30mph to 20mph for restricted roads.

“Totally agree that a blanket 20mph limit in restricted areas would work better than the piecemeal implementation of 20mph speed limits/zones we have at the moment”. (ID 57701856 Neil MacPherson)

A significant additional number who supported the proposal qualified it with some modification based on additional arbiters such as time of day or location. A small number supported lower limits but rejected the need for a change in the speed limit across all restricted roads by default.

The responses demonstrated a level of uncertainty as to what a default reduction would actually look like in practice and confusion as to which roads have “restricted” status. Various respondents expected change to affect residential areas (with no clear sense of what they encompass), others took it to mean a set geographical area (similar to the zone in operation in Edinburgh), others envisaged a set of factors applying, such as the presence of a school, an urban location or a set level of population density.

Responses also demonstrated exasperation with the road classifications system and decisions governing appropriate speeds on faster roads which, while outside its remit, appeared to influence responses on a default change to roads in the proposal.

Setting speed limits – specific areas

Many made the case for a 20mph limit in certain areas which were variously described as “residential”, “built-up” or “restricted”.

Schools in particular were singled out, with a large number of respondents citing them as the impetus for supporting the proposal. Indeed, irrespective of their position in supporting or opposing the proposal, a significant number specifically identified schools as needing lower limits. It was noted that many schools already have a 20mph speed limit but that many others do not.

Other respondents arguing for a 20mph limit that is specific to a defined area or purpose variously included “hospitals”, “narrow residential streets”, “health centres”, “elderly care homes”, “residential and retail environments”, “parks”, “cul-de-sacs”, “town centres”, “small side roads”, “community facilities”, “villages”, and “busy shopping districts”.

Equally, respondents made the case for areas which should not be subject to a 20mph limit including “main arterial routes”, “main roads or busier traffic areas”, “urban roads”, “main streets especially those that are through roads”, “large wide roads”, “wide non-residential roads”.

“The RAC is supportive of 20mph limits in areas where they are most needed, targeted in densely populated residential areas where there are schools, hospitals and care homes for example. However, we are very concerned that setting it as the default limit in urban areas would have the effect of desensitising motorists”. (88WR RAC)

Alternatively, a small number made the opposing case.

“Although the evidence is limited (20’s Plenty 2011), only introducing 20mph around schools – or other identified high risk areas – rather than full coverage (with the exception of main arteries) could lead to confusion amongst drivers and increase the likelihood of non-compliance. It is worth noting also that children will (or would want to) walk or cycle a considerable distance to and from the school and therefore 20mph zones would need to be extended to facilitate this”. (ID 63837097 NHS Health Scotland)

Setting speed limits – specific times

Many felt that the time of day should be a consideration in setting a speed limit, given the ebb and flow of activities in certain places at certain times. For example, a number referred to schools and their environs and made the case for a lower limit at the beginning and end of the school day.

A national approach

The expediency of a default approach in ameliorating the onerous and expensive Traffic Regulations Order (TRO) process was considered, with a number seeing it as a neat resolution to delivering the output uniformly while saving time and money for local authorities.

“An elegant solution to the currently patchy system of changing urban speed limits from 30mph to 20mph”. (ID 57874133 Steve Rowan)

Others were minded that the plans would not deliver the dividends described, that the change would still incur considerable cost and would lose the localised response to managing speed.

“What this bill would do is create a blanket 20mph everywhere, and while the ability to make roads 30mph is provided for, this then becomes the expensive option for councils with ever increasing budgetary pressures, in essence creating very little incentive for the 30mph limit to be applied, even where it is logical to do so”. (ID 58717418 Anonymous)

The point was made that there is a fear that a national approach is “a blanket way of not planning and promoting the creation of proper, safe walk- and cycle-ways in Scotland”. (ID 58628856 Anonymous)

A local approach

Numerous responses identified challenges in local authority approaches. Various attributing them to being resource poor, subject to conflicting opinions and lobbies, or inertia, these respondents welcomed national legislation on the grounds that it would compel local authorities into a course of action and there would be uniformity in the approach.

Other positive considerations included local authorities being able to designate roads as 30mph and the dividends in a simplified procedure and reduction in costs. However, many did not see an economy of scale in this

approach and called for some level of autonomy and ability to designate speeds to specific roads to be retained, considering the proposal to be a poor response to localised need.

“The community council consider that the Scottish Government should not impose unnecessary restrictions on local authorities [and] that the current system [of] speed restrictions on roads should be left in place whereby a local authority can set in place the speed limit appropriate to local conditions after consultation with local residents”. (ID 60225529 Creich and Flisk Community Council)

Ten local authorities fully or partially supported the proposal with a further two partially opposing the proposal and one neutral on the subject. A small number specifically gave views on how the proposal sits with the role of local authorities.

“There is a significant number of existing 30mph restricted roads which will not be suitable for a 20mph limit i.e. distributor roads, through routes etc. For these routes to have speed limits as existing will require under present procedures revised Traffic Regulation Orders to be promoted. The identification of potential 30mph routes may be problematic and open to debate, differences of opinion and objection. The process to promote the Order may subsequently be very time consuming, costly and put significant demands on existing resources”. (ID 60893450 East Renfrewshire Council)

“A blanket approach to restricted roads, as defined, would be very difficult to administer and enforce in rural areas, where 30mph limits are deemed appropriate for the location. The current definition of restricted roads can be confusing to motorists when based on the distance between street lights. There are many rural areas in the Western Isles where lighting provision and signed speed limits vary, however precedence is established by appropriate signage and the promotion of Traffic Regulation Orders. The Comhairle is fully supportive of extending 20mph limits to built up urban areas, however would prefer that discretion is applied to rural areas”. (ID 63819699 Comhairle nan Eilean Siar)

Supporting information and experiences

Mistrust arguments

Within the cadre of responses voicing opposition, a significant number rebutted the entire premise on which the proposal is founded. Many described the proposal as unnecessary, flatly stating that it simply wouldn't work without giving any further explanation and that “we simply do not need this bill”.

Others anticipated negative impacts on various issues such as congestion, speeding, safety, and pollution as detailed elsewhere in this document.

Some respondents took issue with the research detailed in the consultation document, challenged its veracity and interpretation as well as its relevance in application. Others cited a lack of evidence to support some of the assertions or offered other research to support alternative arguments.

“The data on costs benefits is not persuasive – I fully appreciate the costs involved in fatal accident inquiries and the devastation to families – but £4m for an 11% casualty rate? The data on causation is too complex to reach a simplistic A=B i.e. lower speed does not mean there will be fewer accidents. It may lead to lesser injuries but that is a potential rather than an actual benefit”. (ID 58817228 Duncan Fraser)

“Studies have shown that increasing the number of speed differentials causes more accidents than having an increased average speed (Aljanahi et al, 1999) [and] figures published by Transport Scotland show that road deaths have been falling in Scotland in a steady trend, in line with current targets”. (ID 61815761 Anonymous)

A number felt that the consultation document did not adequately detail the cost and was biased in favour of those who do not drive cars, while others said they would like more information.

Experiences of current 20mph limits

Many respondents made reference to their experience of areas where a 20mph limit is already in effect, such as Edinburgh. Some saw an increase in politeness and consideration amongst road users, a way of being more observant, and a number referred to an elevated sense of safety.

“As a driver and a cyclist I have seen the current 20mph zones in Edinburgh greatly reduce the stress of both methods of transport”. (ID 57683881 Anonymous)

Conversely, a number described their experience as too much focus on the speedometer and not the road, signage inappropriately placed, failure by road users including cyclists to comply to speed limits, feeling unsafe as drivers became frustrated, pollution concerns, limits ignored and breaches unenforced.

“The applications of the 20mph limit I have seen so far in Aberdeen and Edinburgh don’t appear to me to have been intelligently applied”. (ID 59622002 Aberdeen Rosemount and Mile End Community Council)

Examples outside Scotland

Edinburgh Council and a small number of members of the public referred to positive experiences in other countries which have a lower speed limit.

“30 kph is the limit for residential areas in many European countries, particularly those with good pedestrian road safety records (ie Netherlands and Sweden)”. (ID 57630444 Anonymous)

In opposition, a few felt that either faster speeds elsewhere worked well or that the anticipated safety dividends of reduced limits had not been realised.

A number referred to a scheme in Manchester as the basis not to pursue the proposal. The scheme, which sets a limit on more than 1,000 roads and around 138 schools in the city, is currently being evaluated for its effectiveness.

Additional points

Other suggestions

Many respondents suggested ideas to supplement the proposal while others gave alternatives which are intended to replace it—

- **Street design:** a number of improvements were suggested including the planning and promotion of safe walk and cycle ways; separating the traffic and wider pavements. Dedicated bus stop facilities to the side of the road to prevent vehicles braking was also suggested as well as combining 20mph measures with the removal of all traffic calming measures to eliminate stop-go driving.
- **Safety measures:** safety railings at the edge of pavements; enhanced visibility, lighting and pedestrian controlled crossings; and particular attention to slowing traffic at roundabouts to prevent accidents were suggested.
- **Strategies:** making the proposal part of a continuum of measures was recommended as well as developing a congestion policy and a clean air policy with a lot more pedestrianisation and a nationwide strategy for road design and safety.
- **Road use:** improvements in public transport and road quality was mooted as well as making residential streets cycle-only and banning vehicles from certain areas.

Question 2: Could the aims of this proposal be better delivered in another way (without a Bill in the Scottish Parliament)?
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Of the 1,281 respondents who answered this question, 220 (17%) said yes, 590 (46%) said no and 471 (37%) were unsure.

694 respondents (51%) gave reasons for their response. A number of points have already been covered in question 1 and so are not restated here.

Do nothing

About 10% of respondents stated that the proposal should not be delivered at all. Asking that the Parliament do nothing, leave the situation as it stands and abandon the plan was the overriding message of this group. A small number asked that something else be done instead without specifying that alternative action.

Legislation

By far the largest proportion of respondents opted for the legislative route. At its most basic, their message was that this initiative is too important not be delivered and legislation was seen as the best route to satisfy that imperative.

There was some criticism of local authorities for not taking action themselves and of the TRO administrative process which “is cumbersome, expensive and does not guarantee that the order can be made”. (ID 61850606 Glasgow City Council)

It was also felt that a blanket approach was required to address the piecemeal approach taken to date.

“A bill in Parliament will ensure that there is consistent action across Scotland, so a person in Stranraer will expect the same road environment as the person in Stromness”. (ID 57778881 GoBike! Strathclyde Cycle Campaign)

Local decision-making

There was some support for local authorities retaining this responsibility. Some highlighted the importance of having local knowledge. Others felt this was within a local mandate and afforded local people the opportunity to contribute to the decision-making process. By extension, many made the point that a reduction to 20mph on all restricted roads currently designated as 30 is not necessary, and that local authorities remain best placed to choose the appropriate limit.

“I don't think that a blanket application of anything is a good idea. 20mph limits should be applied in specific circumstances after there has been an examination of the individual benefits and disadvantages. I know it's easier and cheaper to apply it nationally but really it should be rolled out systematically after assessments have been done”. (ID 58690902 Anonymous)

Improve the current system

Changing the current system for local authorities to apply for Traffic Regulations Orders (TROs) through simplifying or updating the process to reduce time and costs was suggested by a small number including Fife, Glasgow and Shetland Councils. Coupled with this, there were ideas for introducing some means of measurable targets for local authorities in delivering changes or other mechanisms of holding councils accountable to combat the piecemeal approach and regional variation.

“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”. (ID 59690119 Shetland Islands Council)

Road design and management

A number suggested that road design would be the most appropriate solution making recommendations for more, better or differently arranged signs, better traffic light sequencing and changes to road layout which managed speeds more effectively. Improvements in traffic flow and monitoring, infrastructure developments, reintroduction of community speed awareness projects and innovative changes to traffic systems were also suggested.

Enforcement

A large number of respondents called for stepping up enforcement as the best way of delivering results. It was noted that regardless of whether the proposal was implemented or an alternative was pursued, its success rested with the resources available and the attitude taken to enforcement.

This was twinned with a call for common sense on the roads – this is predicated on the belief that speeding itself was not a problem so much as bad driving and so enforcement dealt with the poor standards which in turn delivered the solution. Other points related to enforcement were higher and means-adjusted fines, the introduction of more speed cameras and driving bans.

More travel options

Managing the different types of traffic in a more imaginative way was posited as a solution to safety and better traffic management. An argument was made for more cycle lanes, walking trails and more consideration for bespoke separate routes for non-motorists. Pedestrianisation was considered as well as more clearly demarcated spaces for different road users.

“Separate cycle lanes where possible. Enforce safe urban driving as opposed to slow urban driving”. (ID 57732073 Anonymous)

It was also recommended that authorities incentivise alternative travel options though cycle to work or city bike schemes which is enabled by a robust public transport scheme. In addition, provision of park-and-ride services and support for ultra-low emission vehicles was mentioned.

“Saturate public transport with as many buses and trains as possible for peak hours. Have them frequent, and as high capacity as possible, make them a better, less frustrating, and cheaper alternative to cars and you will bring traffic down during the working week and improve overall driver behaviour”. (ID 60144868 Raymond Monaghan)

Education and awareness

A central theme was the need for education. This call fell into many parts – tougher driving tests, a push for better driving standards, awareness campaigns on the impact of collisions at certain speeds, more work on educating children on crossing the roads – all founded on promoting a culture change and establishing the habit.

“A better route to delivering safer roads would be to invest in and incentivise further driver training – through initiatives such as the IAM’s [Institute of Advanced Motorists] young driver schemes”. (ID 58936970 Anonymous)

Consult and evaluate

A small number saw the need for greater consultation and evidence gathering to support legislation as they thought that the arguments were fairly new and required more time to consider or felt mistrustful of the initial arguments. To this end, there were recommendations to do more analysis, that there was currently not enough evidence and that there was a need to consult more.

In addition, it was suggested that any legislation would benefit from an evaluation to measure the impact post implementation.

“The current patchwork of 20mph limit areas suggests that national legislation for a default 20mph limit in built-up areas would have significant benefits in terms of extending coverage and reducing costs of implementation. The extent of these benefits will depend on how the legislation is implemented, how it is ‘marketed’ and enforced, the level of exemptions, and the behavioural response by road users. There are significant uncertainties around all of these factors, which underlies the need for a thorough evaluation if the Bill becomes law”. (ID 63509014 Social and Public Health Sciences Unit, University of Glasgow)

Other

In addition, there were a number of other suggestions which included—

- enforce the current 30mph and spend the revenue raised to improve local roads and appropriate safety control measures near schools;
- restrict vehicles using streets except for deliveries/specific access;
- build bypasses to enable faster travel to divert away from slower areas;
- encourage car manufacturers to make cars more economical at 15-20mph and improve safety devices that detect potential collisions;
- implement 'presumed liability' measures to further enhance the safety of pedestrians and cyclists;
- establish 20mph zones in each new housing development; and
- make better use of intelligent technology, such as speed cameras, vehicle trackers and GPS.

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

1,177 respondents (87%) addressed this question.

Many of the advantages identified by respondents have already been set out in other sections of the summary and so are not repeated in depth here. The responses to questions 1 and 2 should be referred to for more detailed comment on the perceived advantages of the proposal. In addition, some

responded to this question by flatly stating opposition to the proposal, not giving any advantages or by only listing disadvantages.

Other views included—

- Health: encouraging more people to take up ‘active travel’, i.e. walking (especially children to school) and cycling. It was also argued the proposal would fit with ‘Vision Zero’, the principle that no-one should die or be seriously injured on the roads.
- Societal: creating a better and more social environment in communities, encouraging people to socialise and use their streets more.
- Financial: creating stronger local economies, reduced insurance costs for drivers and home owners.
- Local authorities: avoiding the time consuming and expensive TRO process would provide local authorities with a quick and cheaper alternative to safe street policies.
- Traffic: an improvement in travel times, safer driving and travel experiences.
- Culture shift: this proposal was seen as an important step as part of a culture shift away from the car and towards other road users.
- Technological advances: it was suggested a 20mph speed limit would encourage motor manufacturers to design and produce cars which run more effectively at lower speeds.

Question 4: What do you think would be the main disadvantages, if any, of the proposal?
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1,144 respondents (84%) addressed this question.

Again, as some disadvantages have been set out in a number of earlier questions, those arguments are not rehearsed here again. The responses to questions 1 and 2 should be referred to for more detailed comment on the perceived disadvantages of the proposal. In addition, some responded to this question by flatly stating support for the proposal, not giving any disadvantages or by only listing advantages.

Accident rates

Some felt the change would not result in the expected large number of reduced accidents. Others felt accident rates would increase in the long term as people took bigger risks at slower speeds.

Public transport

Some felt it was expected that lower speed limits would result in greater use of public transport. There were concerns that public transport would not be able to provide sufficient capacity to provide a viable alternative form of transport as expected.

Roads

Added disruptions such as additional traffic calming measures and additional signage were highlighted.

National and local strategies

A small number of respondents, while supporting the proposal, considered how it interacted with other strategies.

Some commented on the need for a strategy that rethinks road usage to address the growing volume of traffic, the quality of the roads and road safety initiatives.

In addition, it was asserted that a number of sustainable transport, active travel, and environmental issues need to be advanced and must continue to do so. One respondent felt that the proposal “might be seen as a panacea for vulnerable road users” (ID 59281369 Anonymous) with the result that other measures such as better crossings or appropriate walking and cycling spaces are no longer considered a priority.

Altering driving routes

Some felt that drivers may plan to avoid areas which have a lower limit and use other roads, thus shifting the problem and making the alternatives busier and possibly more dangerous.

Driver discord

There was some concern that motorists would become frustrated with one another either because they were obeying the limits and driving too slowly or, conversely, breaking the limits and driving too fast.

Unnecessarily low limits

A recurring opinion was that some restricted roads should not be subject to a 30mph limit in the first instance and so that limit should not be reduced further. As a result, not reviewing each road independently and arriving at an appropriate speed limit was seen as a disadvantage by some.

In addition, there was concern that a 20mph limit was so low that it was very difficult not to breach, thus criminalizing responsible road users as well as “the night crawl at 20mph through the empty towns”. (ID 58628856 Anonymous)

Resistance

Some mentioned how long it would take for road users to accept and become accustomed to a new limit while there was an anticipated “backlash from motorists who believe they are entitled”. (ID 59500012 Anonymous)

“Drivers will have an increased level of contempt for the authorities. They will question the validity and relevance of posted speed limits, and discipline and tolerance on the roads will be further lost”. (ID 63979432 Anonymous)

Question 5: 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.

1,129 respondents (83%) answered this question. Many of the measures to maximise compliance identified by respondents have already been outlined in earlier sections of the summary and so are not repeated in depth here.

Enforcement approaches

Enforcement

The majority of respondents referred to enforcement as a means to maximising compliance. The need for an overarching and robustly applied national approach was highlighted by many and this remained true whether respondents supported a lower limit or preferred the limit to remain at 30.

“Enforcement is important (but of course, existing 30mph limits are widely flouted). Those who drive their cars in dangerous and antisocial ways need to know there is a realistic chance of getting caught and seriously punished”. (ID 64030370 Christopher Russell)

Given that 20mph is an attainable speed for bicycles as well as cars, the question was asked how cyclists could measure their speed and whether police would enforce the limits on non-motorised transport.

Those opposing the proposal raised how having police enforce measures which are seen to be unnecessary and unpopular might impact negatively on their reputation.

“To ensure compliance with a 20mph speed limit on roads where most drivers consider 30mph to be safe would require draconian levels of enforcement that are not acceptable in a democratic society. Laws need to command the respect of the majority of the public. A national 20mph restricted roads speed limit would not command that respect”. (ID 62011507 Alliance of British Drivers)

Police visibility

When considering enforcement, a significant number referred specifically to more police personnel on the roads and streets. This fell into two distinct themes.

The first was the perception that it has become rarer to see police in the course of their normal business— that being the case, speeders were much less likely to obey the limits as there was an expectation of impunity.

“Actually have some police officers on the streets to enforce laws. There is no point in increases fines etc for traffic offences when there are no police around to see offences being committed. Current example of this is the mobile phone rules. Drivers are seen flouting this

law regularly with the knowledge that the police are unlikely to see them”. (ID 59871671 Anonymous)

Secondly, there was a large number who argued that the key modifier in driving behaviour was some sort of speed check staffed by onsite police.

Speed cameras

Many called for speed cameras, particularly around schools and areas with a high incidence of accidents. Others made the case for using CCTV or installing smaller speed cameras on lampposts.

The use of average speed cameras which indicate the average speed of a vehicle using multiple locations and Automatic Number Plate Recognition (ANPR) technology was also suggested as a means to remotely enforce the limit.

Other police enforcement methods

A small number recommended the use of the ‘pop up police officer’, a specially-built, life-sized model, which is designed to deter speeders.

Examples of successful enforcement in Spain and Portugal were considered, where, if a driver exceeds the limit, speed controlled traffic lights turn red causing the driver to be delayed.

Community involvement

Opportunities for community support for enforcement was identified by utilising the Neighbourhood Watch and local initiatives such as community speedwatch.

“In our village ... some success in slowing traffic has been achieved by residents in hi-vis vests standing at the road side in appropriate locations”. (ID 58585763 Anonymous)

“Use of car dashcams, with public being encouraged to share video with law enforcement agencies where excess speed is identified”. (ID 58785595 Dr James Houston)

Penalties

A number recommended that the initial compliance period, while still vigorously policed, should be accompanied by warnings rather than punitive measures to give time to become accustomed to the prevailing speeds.

However, a much larger number were very clear that a system of robust sanctions should be implemented. This included higher levels of prosecutions as a deterrent, as well as penalty points, fines, loss of licence and community service orders. Tiered penalties based on the degree of excessive speed or the speeder’s income were recommended as a means to make the punishment fit the crime.

Highlighting the issue by publicising court cases of speeders was seen as a deterrent. It was also recommended that speeders had a mandatory re-education programme or had to automatically retake the driving test.

It was also suggested that convicted speeders should be reported to their insurance companies.

Developing technology

Some respondents saw opportunities in emerging technology. Many referred to the range of technology already installed in cars and asked whether it was possible to have a pre-set speed of 20 in new cars with cruise control or systems which had automatic speed limiting or speed reporting.

“GPS-linked enforcement fitted as a mandatory condition of operating licence to buses, taxis and private hire vehicles (as implemented by TfL on London buses to make safety part of the design of their operations)”. (ID 61815080 Johnston Orr)

An external display in cars was also suggested that indicates speed with figures large enough for police to read or speed cameras on busses to monitor oncoming and overtaking traffic.

“Use an app on drivers smart phones that track their speeds in built up areas (similar to those by some insurance companies). Record speed limit compliance and give drivers a score out of 100% per week/month etc. Drivers with 95-100% compliance qualify for cheaper car insurance or a discount on their road fund duty”. (ID 63935356 Anonymous)

Road management

Signage

A large number of respondents saw signage as the best means for maximising compliance to a 20mph limit. Within that, many thought the signage needed to be large, prominent, plentiful and clear.

There was also a call for signage specifically to make start and end zones to the reduced limit zones less ambiguous. This was supported by calls for more markings on the road itself and changes in the colour of the road surface.

Responsive signs

The case was made by a significant number that signs which report speed were instrumental in reducing speed. Many reported that it was the key factor in modifying their own driving speed. Various described as “flashing signs”, “smile/sad face signs” or “your speed” signs, there was some debate as to whether fixed or portable ones were more effective.

Road management and design

Innovative road design and traffic flow management were also postulated as a means of compliance. Measures which change a road’s shape or flow such as chicanes, one-way systems and lane priority were suggested.

“Alter the physical road structure to support positive behaviours and limit negative behaviours”. (ID 61869904 Kevin Duffy)

Some felt that ramps were a means to reduce speeds, while a larger number called for more imaginative measures for slowing traffic, considering ramps to be dangerous to cyclists and destructive to cars. Alternatively, some recommended rumble strips and changes to the road surface to indicate the change in road use and accompanying speed limit.

“Physical signifiers of the ‘gateway; such as road surfaces and pavement widening to show that a slow zone is being entered”. (ID 58672521 Alison Clark)

Education and awareness

Awareness

Almost a quarter of respondents recommended an awareness programme to support the implementation of new limits, explain expected increases in safety and wellbeing, and encourage compliance.

“A crucial part of any change to the default speed limit would be to run a wide and effective public advertising campaign to make people aware of both the changes to the law and the benefits of driving at 20mph”. (ID 61905818 Transform Scotland)

Suggestions variously included—

- Advertising and TV campaigns
- National launch day
- Extensive use of social media
- Two-way communication and consultation.

Aside from a national top-down approach, local efforts were also encouraged and viewed as integral to the success of any awareness programme.

“The provision of information leaflets from local organisations like Community Councils, School Parent Councils, Scouts, Guides, Old Folks groups etc”. (ID 59519818 Blairhall Primary School Parent Council)

Examples of local campaigns such as ‘20 is plenty’ stickers on wheelie bins was applauded for being cheap to roll out and demonstrating the support of the affected community. Memorable or emotive slogans such ‘Kill your speed, not a child’ were also considered to be very effective.

Education

There were many who thought that awareness could only be built on a solid foundation of education. To that end, more comprehensive and rigorous driving tests, tests for other road users such as pedestrians and cyclists and inclusion on the school syllabus were all recommended.

It was also suggested that professional drivers such as bus and taxi drivers are targeted first to help the message filter to other drivers more quickly.

Resources

Police resources

A perceived or actual paucity of policing resources was referred to throughout the consultation. Some called for more policing resources to manage compliance while others argued that police time could be better used pursuing other crimes.

Other help

It was suggested that other agents such as traffic wardens or community wardens could be trained to carry out some form of enforcement such as random speed checks and pass the information to Police Scotland for processing.

Finance

A number made the point that, at the very least, the implementation stages would be expensive but in order to maximise compliance it was a cost worth considering.

Time

The point was made that compliance was part of a culture change which takes time. That being the case, the commitment to raising awareness and enforcing the change must be equally long term.

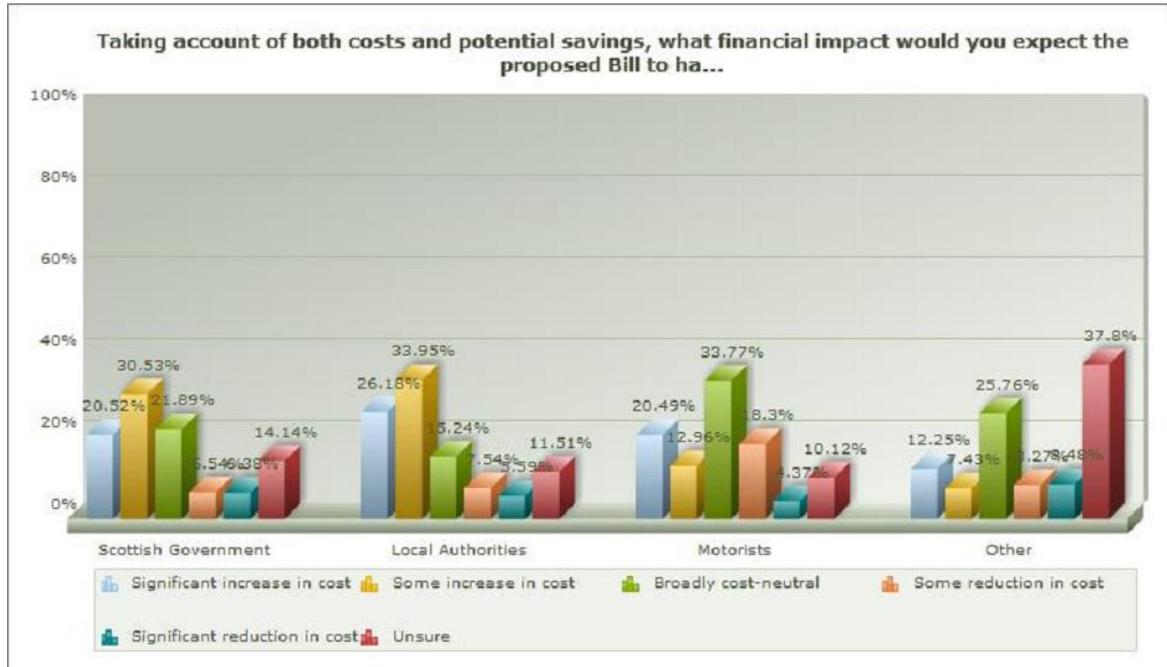
Other

There were a number of other suggestions to encourage or mandate compliance which included—

- select appropriate roads for 20mph limit;
- develop a better and cheaper public transport infrastructure;
- reduce width of roads to make way for cycle lanes and or increased pavements;
- consider the impact on public transport of the speed restriction;
- build on the dividends in Local Authority areas plans;
- give more thought to demarcating school zones;
- limit parking to allow safe crossing;
- introduce registration plating and road taxes for cyclists;
- improve the conditions of the roads;
- encourage driverless cars; and
- update satellite navigation maps.

Question 6: Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have?

1,247 respondents gave their view on costs and potential savings.



857 respondents (63%) provided further reasons for their response. Points raised in earlier responses have not been repeated in this answer.

Responsibility for costs

In considering who should be responsible for any costs, it was broadly felt that the Scottish Government should be answerable for the administrative costs of the legislation, including advertising the change in the law so that a consistent message would be provided to all citizens. There was some suggestion that the government could also bear some of the initial costs of the implementation and logistics which resulted from the legislative change.

However, there was a significant number who felt that this was the purview of the local authorities as was signage costs. In addition, there was a split view as to whether the public (particularly motorists) would be better or worse off; but almost all identified the health and emergency services as making significant long term savings.

Extent of costs and savings

There was an extremely broad range of opinion on the extent of costs and savings. A range of negative comments cited a waste of public funds, that money could be better spent elsewhere and that these are straitened times. Similarly, a slightly smaller but nonetheless significant number advanced positive views of savings and financial benefits. Neither group provided specific information to support these views.

“The proposal has the potential to create financial savings for Scotland and in particular, for local authorities. The current model of creating multiple 20mph exemptions to a 30mph limit is inefficient. Furthermore, safer and cleaner roads will save public services, such as the NHS

money as they will not be required to treat injuries and illnesses that result from road accidents and air pollution”. (ID 63852612 Cycling UK)

A rather larger number considered the proposal to be cost neutral or of incurring some costs in the implementation stages but engendering savings in the health, infrastructure and commercial arenas in the long term as a result of improvements in safety.

“Additional cost would be generated due to additional policing, new signage and resetting speed cameras. There would be savings due to less fuel being burned and less people being treated in hospital due the effects of less accidents and less poisoning from reduced exhaust fumes”. (ID 61804456 John Hamilton)

A collective approach

Many saw national legislation bringing savings as it negates the costly piecemeal process currently in place for individual local authorities. This shared cost, consistency of approach and expediency was highlighted by many as being value for money. Supporters of this approach underlined the benefits of economy of scale – that collective signage, communications or promotion would reduce costs.

“From Edinburgh's experience in implementing a citywide 20mph network, the current estimate for the works (encapsulates construction, design, project management, communications, and statutory costs) are in the order of £2.8m. If a 20mph default had been in place it is estimated that it would have costed £450,000 to implement an equivalent scheme— six times less! Had a default 20mph been in place, the Edinburgh scheme would have required far fewer TROs and would have necessitated far fewer design alterations, which would have had clear cost savings”. (ID 61964723 City of Edinburgh Council)

Fife Council referred to the cost advantages of extrapolating their 20mph model nationally—

“If the experience in Fife was replicated across Scotland the cost benefit of the significant reduction in casualties would have a positive multi £M (million pound) impact on the Scottish economy”. (ID 59144570 Fife Council)

Conversely, a number pointed out that Local Authorities would now have to undertake costly processes to undo the collective reduction of limits on some roads and effectively apply a local exemption.

Car costs

The topic of car costs occupied more than one in five respondents, who were mainly individual members of the public. Opinions were split on the subject: those who supported the proposal and gave a view on car costs almost universally anticipated better financial outcomes for the motorists. This view saw savings in fuel costs and maintenance through smoother running of

engines and less stop start driving. Amongst those seeing a saving were those who thought that the slower speed would incline some drivers to leave the car at home and seek alternative transport or active travel – with the outcome that the car is less used, less fuel is needed and less wear and tear on the car.

However, the correlation between those who expected an additional burden for the motorist and their opinion of the proposal was not as clear cut. While the majority consisted of those who opposed the proposal there was also a small number who, while supporting the proposal, still saw a financial cost to the motorist. This view included the point that modern cars are not designed to run efficiently at 20mph, would see significant fuel and repair costs, and some concern that this might result in higher road tax to fund the change.

A reduction in insurance premiums in the long term was anticipated as a direct result of fewer collisions.

Signage

The most commonly recurring cost referred to by respondents was that of signage and associated infrastructure costs. Most saw costs in the initiation stages, implicitly based on a universal change at a fixed point in time.

Promotion

For the most part, those who identified a change in signage linked this with promotion of the change. This promotion divided into a couple of key themes – advertising and communicating the message and educating the population; and, to a lesser extent, consultation.

For those who identified advertising and communicating the message, many were very prescriptive, describing advertising and TV campaigns, a national launch day and opportunities within social media.

Those who referred to the need for education mentioned the “green cross code”, the Highway code, different road tests, awareness of better driving skills and a commitment to continuous improvement.

Legislation and enforcement

The costs for developing the legislation were not seen to be overly onerous although the impact on Local Authority staff in understanding new measures and putting it into practice locally was identified by individual members of the public. Some also expected the courts to be busier with more violations of the law.

The issue of enforcement has been a constant factor throughout all answers and in this section the concern over resourcing and empowering Police Scotland came to the fore. Many took the view that successful implementation of the policy rested in enforcement and felt it was unlikely that this could happen with current resources. It was anticipated that rigorous enforcement could yield increased income through penalties and there were some who

called for higher fines. However, while some saw this as a means to defray policing costs, it was not greeted positively by all.

Time and money

There was division of opinion on whether the new measures would have a cost in money and time for citizens and businesses.

Arguments were broadly that as the traffic is slower, more time is spent in cars, and journeys are longer. Many identified knock on effects such as being late for work or effects on childcare provision as well as an argument that spending more time in cars is bad for your health.

A number, mainly members of the public and evenly split in their support of or opposition to the proposal, identified the potential for negative effects on commercial interests. The most common was that commercial drivers such as taxis or delivery companies would be adversely affected as they could complete fewer deliveries at a slower speed or that businesses might become less reliable if they could not rely on 'just in time' business models to get the stock/products.

However, the point was made that active travel can be a positive in terms of time and money—

“Given that the speed limit should have the effect of reducing overall use of motor vehicles and increase the overall participation in active travel there should be significant savings in the overall costs to society reflected by these different transport choices. For example, the Copenhagenize Design Company found recently that one mile travelled on a bike is a \$0.42 economic gain to society, whereas one mile driving represents a \$0.20 loss. A number of factors are included in the equation such as transport and infrastructure costs, security, comfort, branding/tourism, transport times and health. In the context of the city of Copenhagen this meant shifting 1% of drivers to become cyclists gave a total net benefit of \$71.9 million”. (ID 62278402 D. Trotter)

Health

By far the largest number of respondents cited improvements in health outcomes. This broadly divided into treatment of acute injuries as a result of accidents, the longer term health of individuals with chronic conditions and the overall impact on service provision.

A number spoke specifically about the expected reduction in the number of accidents and a lessening in severity of injuries at slower speeds. Some referred to related consequences for accident victims both in terms of physical recovery and the implications of being unable to work as a result of injury. The longer term effects were also discussed in terms of promoting a healthier population, more active travel and fewer health issues associated with a sedentary lifestyle. It was anticipated that both in the short and long term, improved health outcomes would result in much less strain on the health, police and emergency services and that would bring savings in the future.

“The casualty reduction costs of 20mph limits are proven to be significant. The public health benefits of lower speeds and more active travel is truly enormous. Much of the recently launched Healthy Streets initiative in London is based on lower speeds and 20mph limits. Our society will continue to grow less and less healthy unless we encourage people to be out and about more. This move will lead to enormous cost savings in the longer term”. (ID 60190073 Jeremy Leach)

This linked to numerous references to better quality of life, improved communities and less inequality as unquantifiable costs as well as the economic benefits of a workforce not being ill or injured.

Road maintenance

Many described a causal link between slower speeds and slower deterioration of the road surface which would be a saving to the local authority.

Pollution

There was division on whether pollution would be worse or better as a result of a 20mph limit and these arguments are rehearsed more fully in earlier sections.

Other

There were a number of other suggestions which included—

- establish better legal cover for cyclists and other road users;
- consider a government funded scrappage scheme in the long term to facilitate newer, more economical cars; and
- address high public transport costs so they become a viable alternative particularly for those on lower incomes.

It was also anticipated that there would be fewer cases of accident victims suing or seeking financial redress.

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

1,108 respondents (82%) responded to this questions. Points raised in response to earlier questions are not repeated here.

The health benefits, promotion of active travel, opportunities for pleasanter surroundings and less stressful lifestyles were all underlined once more.

“The long term benefit will be in the increased activity levels as people switch from the car to walking or cycling for shorter and local journeys. This benefit is probably the most important one for society as a whole, as the impact of sedentary lifestyles in the modern world is becoming more apparent”. (ID 60515779 Living Streets Scotland)

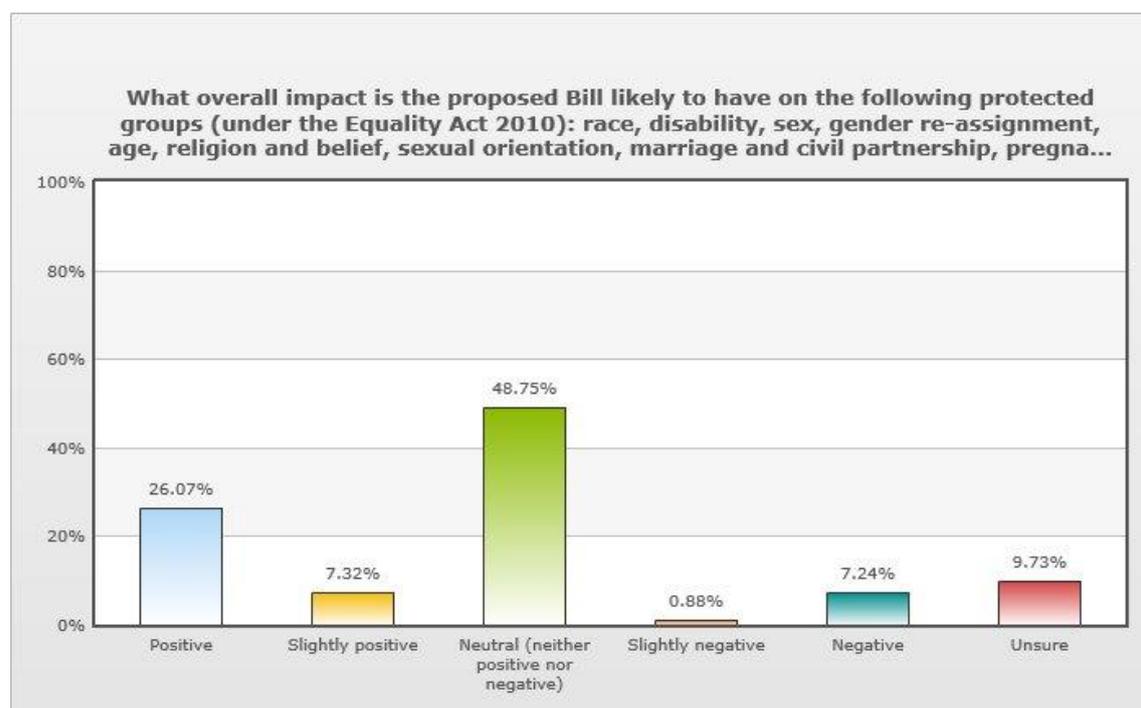
In addition, the following points were made—

- more people who live outside cities may use public transport to get into the city;
- it should be acknowledged that speeding is socially unacceptable;
- the take-up of electric vehicles which are particularly suited for this kind of driving should be encouraged;
- there is scope to create a more thoughtful and considerate society;
- a discussion is needed on how the physical environment is designed and how society can move away from the traffic dominated design of the past;
- the proposal contributes to the Scottish Government’s aims of increasing walking and cycling levels as set out in the National Walking Strategy and Cycling Action Plan for Scotland; and
- “At Community Council meeting all across Scotland, people will finally be able to point to the advisory Twenty’s Plenty zones and say to the Police that they can now be enforced and reduce communities concerns over inappropriate speeds – especially near schools.” (ID 64030316 Anonymous).

A number pointed out that they saw no initial benefits and so there could be no additional benefits.

Question 8: 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?

1,243 respondents gave a view in response to the question and their views are illustrated on the chart below.



716 respondents (53%) gave reasons to explain their views. Points raised in earlier responses have not been repeated in this answer.

Safety, health and mobility

Both being and feeling safer were highlighted as benefits for protected groups who have health, mobility or safety considerations. In the main, older people, people with health conditions, people with disabilities, children and pregnant women were all mentioned as potential beneficiaries of slower speeds. In particular, improvements in activities such as crossing the road, walking or cycling were anticipated.

A feeling of being unsafe was referred to as the reason why older and female cyclists feel inhibited and it was hoped that the change in speed limit could reduce this fear leading to increased cycle use by these groups with consequent improvement in health and mobility.

The safety of parents with children in prams in negotiating traffic and crossing the roads was also a focus for improved safety.

Improvements in health were also expected with particular emphasis on cleaner air benefiting all but particularly pregnant woman and children. There was also an expectation that slower speed would be a relief to those experiencing anxiety-related health problems.

Independence

It was felt that lower speeds could help to promote more autonomy and self-sufficiency amongst groups who have had to rely on others for help.

“This would be an improvement to many invisible people in society, disabled and children are not able to easily travel independently and safely. Right now there is a significant portion of society physically isolated because they cannot get out and about the town or local area due to the hostile motor traffic”. (ID 63965853 Anonymous)

The fact that children cannot drive and can only travel independently through active travel or public transport was underlined. Based on the anticipated improvements in safety levels, children will benefit by being able to move around more freely with a reduced risk of harm.

Societal

The impact of safer roads in communities in helping to make shared spaces more accessible to those with disabilities or limited movement was identified, thus creating better societal inclusion for older people and those with disabilities.

“Women and those with disabilities are generally at a disadvantage in terms of travel because they are less likely to have access to a car, and more likely to rely on other modes of travel (including cycling and walking). As a result, actions which reduce the vulnerability of these

groups to road danger will be beneficial in terms of equalities". (ID 57720338 Dr Caroline Brown)

Question 9: Could any negative impact of the proposed Bill on any of these protected groups be minimised or avoided?

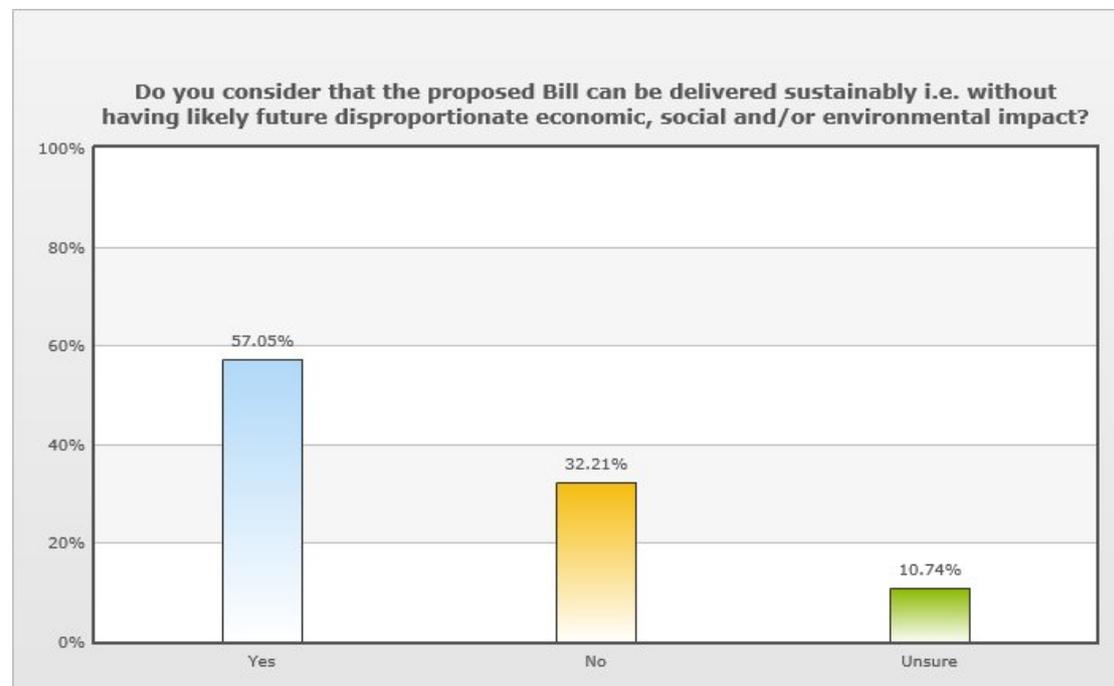
692 respondents (51%) answered this question. Points raised in response to earlier questions have not been repeated here.

The overwhelming majority of responses saw no negative impact, answered 'none', saw the question as irrelevant or used the response to canvass for implementing or dropping the proposal.

Of the remaining responses, most suggestions have already been reflected in the summary of question 8. In addition, it was recommended that information tailored to specific disabilities such as audio or large print versions were made available and the provision of Motability scooters to older people should be considered.

Question 10: Do you consider that the proposed Bill can be delivered sustainably i.e. without having likely future disproportionate economic, social and/or environmental impact?

1,248 gave a view in response to the question and their views are illustrated in the chart below.



671 respondents (50%) gave reasons for their response. Points raised in relation to earlier questions have not been repeated here.

There was a general sense of positive economic, social or environmental outcomes once the initial programme has been introduced and that initial outlay costs would be recouped within the medium to long term. The feeling was that once established, the benefits would be positive and cost-saving.

The key view was that any small cost incurred as part of the commencement process would be negated in the medium to long term by savings. These savings were identified principally as a lower demand for health care provision, both as a result of fewer road injuries needing emergency care as well as less long-term chronic illness due to more active lifestyles and better air quality.

Society

- It was anticipated that areas where traffic is less intrusive would produce safe and more resilient communities and be more desirable places to live and shop.
- Better mental and physical health, an increase in active travel and less stress were all anticipated.
- Increased levels of community cohesion were foreseen with a supportive environment for older people's increased mobility and children being able to travel to school independently.
- Reduced need for cars was seen as a benefit for the economically disadvantaged through enhanced safety of active travel and increasing availability of public transport.

Travel and technology

- A greater emphasis on public transport, walking and cycling and less use of the car for short journeys was expected and was founded on a more sustainable approach to transport.
- Reductions in fuel use and lower emissions, air and noise pollution were highlighted as well as improvements in traffic flow and reduced levels of road maintenance, particularly lower impact or wear and tear on road surfaces.
- Opportunities to harness new technology such as sensors, self-driving vehicles, electrification of transport were expected as well as the use of renewable energy (solar powered signs) and smart traffic controls.

Expected economic, social or environmental challenges included—

- longer urban travel times and more traffic tail-backs;
- higher pollution from carbon dioxide levels and particulates in the air;
- increased fuel usage; and
- additional time in traffic resulting in increased costs to distributors.

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

768 respondents (57%) gave further comments or suggestions. Points raised in relation to earlier questions have not been repeated here.

Many respondents simply stated that they had nothing additional to say.

Some in support welcomed the proposal, expressed hope that it be moved forward sooner rather than later and referred to benefits such as safety, health and community.

“Scotland led the way on the smoking ban, plastic bags restrictions and on reducing the alcohol limit for drivers— the nation has gained a great reputation for getting these kinds of forward looking, common-sense, people-first policies in place quickly and in the face of opposition from populists, lobby groups or certain vociferous columnists and elements of the media. Good luck with this!” (ID 62956822 Paul Barlow)

Alternatively, many restated their opposition to the proposal, described it as a “solution looking for a problem” (ID 59740761 Michael Brunson) and referred to the points raised earlier, chiefly a mistrust of the evidence, and numerous reasons as to why they viewed the proposal as counter-intuitive at best and wrong at worst.

“It's a backwards step. With the reduction in braking distances and pedestrian safety in modern vehicles, the limit should be going the other way”. (ID 63967628 Anonymous)

Variable conditions

A number of responses suggested additional limits, some form of modification to the proposed change from 30mph to 20mph on restricted roads or other variations which included—

- consideration of other limits such as 25, 15 or 10mph on some urban and residential roads;
- the establishment of a 20mph zone around all schools, hospitals, or retirement home areas regardless of whether they are situated on restricted roads or not;
- consideration of a lower speed limit during daylight and a higher speed limit in the hours of darkness;
- concern that local authorities may try to re-impose 30mph limits along many routes;
- recommendation that 20mph limits should apply along a school route, along roads where the pavement is less than 1.5m wide or where the road is less than 6.5m wide;
- the introduction of a car free area around a demarcated school zone;
- a recommendation that it should be extended to rural bus stops at bus collection/drop off times;
- allocating a slower speed for one road, where a number of faster roads are running in parallel, so that there is always a safer route for cyclists; and
- producing revised guidance with greater flexibility as to 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.

Measures for road users

There were also a range of suggestions that affect the conditions of road use, and opportunities for road users. These included—

- combining the proposal with the improvement of safe cycle infrastructure;
- considering sharing the use of pavements, if wide enough, to include cyclists;
- addressing the inadequate public transport services available in remote and rural localities;
- a rethink of on-road traffic instructions;
- consideration of the Scandinavian model wherein street signage and pavements have been removed which essentially pedestrianises roads so that drivers and pedestrians have to pay more attention;
- allowing cyclists to cycle 'the wrong way' down one-way streets;
- making restricted roads less appealing to traffic by limiting access in some cases so as to avoid 'rat runs' while still allowing simple, safe movement for pedestrians and cyclists;
- a better understanding of appropriate driving in built-up areas through discussion groups and increased training for motorists; and
- better warning signs for areas such as schools.

Public transport

Comments included calls for—

- public transport improvements to run alongside the proposal so citizens choosing alternatives to cars are not disadvantaged;
- better and cheaper public transport; and
- the right for more public transport to have priority lanes/points where they can overtake private vehicles especially in peak traffic times.

Consultation, implementation and monitoring

Many responses focused on how the proposal should work in practice and be measured, as well as any opportunities for possible synergies.

“The existing document of guidelines published by the Scottish Government sets out criteria that could be enforced easily if the necessary legal changes could be made to permit the 20mph charges to stick as they do not have the required by-laws in place”. (ID 59882068 Anonymous)

“From Edinburgh’s experience, a number of factors should be taken into account when making an assessment about whether to introduce a 20 mph speed limit. These should include, but are not restricted to, the following—

- road/street functions – including ‘place’ roles such as shopping streets, mainly residential, and ‘movement’ bus services, through traffic, local access, numbers of pedestrians and cyclists, formal walking and cycling routes;
- composition of road users – including existing and potential levels of vulnerable road users;
- existing traffic speed;

- accident data – including frequency, severity, types and causes;
- road environment – including width of road and footway, sightlines, bends, junctions, pedestrian crossings; and
- local community – including consultation with emergency services, public transport providers and impact on residents (e.g. usage of road, parking facilities, noise and air quality)". (ID 61964723 City of Edinburgh Council)

Other measures for consultation, implementation and monitoring included—

- a request for a fully-costed analysis and clarity on who will bear the burden of the cost;
- the need for consultation with local authorities, local communities, emergency services, public transport providers and local businesses;
- taking time to plan and deliver engagement and communication;
- getting political buy-in;
- trials conducted across a range of communities to ascertain impact;
- a national review of all speed limits with a view to bringing them in line with current vehicle capabilities and safety standards overall;
- more focus on an integrated systems approach so that the result is efficiency and safety;
- consideration of country roads which don't have a central marker and how safe speeds are judged; and
- developing technology that allows school crossing attendants to clock and report speeders around school areas.

Comments

There were a number of comments on the proposal which asked questions or made observations for consideration. These included—

- a query whether noise pollution could be considered as part of the bill;
- the suggestion that research is needed to make roads safer without the 20mph proposal;
- concern that the public are not going to be listened to and that the democratic process may be bypassed or ignored; and
- the view that the overall objective is appropriate but that the proposal is too simplistic, as it needs to account for other types of road and the resources needed to achieve the goal.

SECTION 4: MEMBER'S COMMENTARY

Mark Ruskell MSP has provided the following commentary on the results of the consultation, as summarised in sections 1-3 above.

I'd like to warmly thank all those who took time to respond to the consultation on this bill proposal, the Scottish Parliament Non-Government Bills Unit and all those who contributed to the production and publicity of the consultation.

The numbers of responses from individuals across the length and breadth of Scotland have reached beyond my expectations. So too have the number and diversity of organisations responding, from local authorities to health authorities, community councils to school parent councils and bodies covering a wide range of special interests from accident safety to cycling and motoring.

The level of detail submitted has made this exercise valuable, not only in helping the development of the proposed legislation, but in understanding modern perspectives on how we use our streets.

There are many detailed individual points to consider, but the headline conclusions that I have drawn are as follows.

There is widespread and overwhelming majority support for the introduction of a default 20 mph limit on restricted roads in Scotland mirroring the results of recent public opinion surveys. There is also strong evidence to show that public support will rise even further once 20 mph limits are more widely implemented.

The benefits of this proposal are clear and reflected by the vast majority of respondents. The opportunity to reduce speed in built-up areas will make a real contribution to reducing the number and severity of accidents, especially for the most vulnerable. The support of health and accident prevention organisations are particularly welcome in this regard.

It has also been highlighted by many respondents that reduced speed can help create an environment more conducive to walking and cycling with the associated quality of life benefits this brings.

While the introduction of a 20 mph default speed limit is not a panacea, there is evidence that it would provide a strong foundation for the success of other measures such as dedicated cycle infrastructure investment and promotion.

A large proportion of opponents and some supporters of the proposal believe a blanket approach to 20 mph speed limits on every restricted road would be inappropriate; I agree. The proposal seeks to allow local authorities to retain 30 mph limits on selected roads, especially where they function more as arterial transport routes than residential streets. I will return to local authorities to discuss the issue of where this line should be drawn and how appropriate guidance could be implemented on the back of legislation.

More responses from businesses in Scotland would have been welcome to inform the view on commercial activity. However, the responses we received, plus the lack of responses from business, suggests that there would not be a significant impact on journey times or commercial activity.

Enforcement was another key consideration for both supporters and opponents of the proposal. Fife Council report that enforcement has not been an issue in their extensive 20mph areas. Early discussion I have had with Police Scotland has demonstrated their confidence that a national change in the limit can be enforced appropriately. I will seek further views from Police Scotland and local authorities about what a national programme of effective education and enforcement measures would comprise.

I will also seek further discussions with local authorities about the work that would be required on the ground in the run up to a national switch and how the effectiveness of a 20 mph limit could be further strengthened through investment in road infrastructure over time.

The introduction of a 30 mph default speed limit for restricted roads first took place on 18 March 1935. This consultation has revisited the question of a permanent change for the first time in nearly three generations and in a very different road traffic context. The level and depth of responses has been robust and will pave the way for the introduction of a Member's Bill in 2018.

ANNEXE A

The Friends of the Earth Scotland campaign received 706 responses based on the following text:

I am writing in support of your Proposal for a Members' Bill on 20mph zones. I am responding as an individual member of the public.

1. I fully support your proposal to replace the 30mph default speed limit on restricted roads with a 20mph limit.
2. This proposal is the best way to deliver on its aims and on Scottish Government policy, which supports 20mph zones in residential areas. Currently local authorities must embark on an expensive, time consuming process to change the limit which can yield patchwork results. 30mph should be made the exception rather than the rule.
3. The proposal will make our streets safer, and therefore will unlock the potential for higher rates of walking and cycling, leading to modal shift and lower overall levels of air pollution and carbon emissions from the transport sector. There is also evidence that 20mph zones encourage smoother driving and therefore fewer emissions, particularly of NOx and PM from diesel cars.
4. I do not see any disadvantage with the proposal.
5. A combination of advertising, signage, and police enforcement should be used to maximise compliance. Traffic calming measures such as speed humps should be avoided where possible due to their potential to cause stop/start driving.
6. The proposal has the potential to create financial savings for Scotland and in particular, for local authorities. The current model is inefficient. A change of the default limit would require just one Scotland-wide change and associated campaign rather than individual local authorities having to go through relevant Traffic Regulation Orders, launching targeted campaigns, etc.
7. Safer streets will make for more pleasant and socially cohesive urban environments with potential benefits to local businesses, happier residents, and more thriving communities. Fewer road casualties, the potential increases in walking and cycling, and the potential reductions in pollution will lead to a healthier and more active society, with associated cost savings to the NHS.
8. 30% of people don't have access to a car and yet our streetscapes are dominated by cars. Evidence also shows that people living in deprived communities are more likely to suffer in road crashes, so making streets safer will contribute to a more equal society.

9. There is no negative impact of the Bill on equality.

10. I strongly believe that the proposed bill can be delivered sustainably and without having likely future disproportionate economic, social and/or environmental impacts.

11. Thank you for considering my response.

The Scottish Green Party campaign received 384 responses based on the following text:

1. I fully support the proposal to replace the 30mph default speed limit on restricted roads with a 20mph limit.

2. This proposal is the best way to deliver on its aims and on Scottish Government policy, which supports 20mph zones in residential areas. Currently local authorities must embark on an expensive, time consuming process to change the limit which leads to inconsistency.

3. The proposal will make our streets cleaner, healthier and safer. It will unlock the potential for higher rates of walking and cycling, leading to modal shift and lower overall levels of air pollution and carbon emissions from the transport sector. There is also evidence that 20mph zones encourage smoother driving and therefore fewer emissions, particularly of nitrous oxide and particulate matter from diesel cars.

4. I do not see any disadvantage with the proposal.

5. The bill can be enforced the same way 30mph speed limits are enforced.

This could be backed up by a combination of a national advertising campaign, signage, and police enforcement.

6. The proposal has the potential to create financial savings for Scotland and in particular, for local authorities. The current model of creating multiple 20mph exemptions to a 30mph limit is inefficient. Furthermore, safer and cleaner roads will save public services, such as the NHS money as they will not be required to treat injuries and illnesses that result from road accidents and air pollution.

7. Safer streets will make for more pleasant and cohesive urban environments with potential benefits to local businesses, happier residents, and more thriving communities. Fewer road casualties, the potential increases in walking and cycling, and reductions in pollution will lead to a healthier and more active society, with associated cost savings to the NHS.

8. About a third of people don't have access to a car and yet our streets are dominated by cars. Evidence also shows that people living in deprived communities are more likely to suffer in road crashes, so

making streets safer will contribute to a more equal society. There is evidence to show that those on lower incomes are more likely to walk, cycle and use public transport as their main means of getting around. Creating a safer and cleaner road environment will benefit those on lower incomes.

9. There is no negative impact of the Bill on equality.

10. I strongly believe that the proposed bill can be delivered sustainably and without having likely future disproportionate economic, social and/or environmental impacts.

11. Thank you for considering my response.

Among those using these pre-prepared texts, a few slightly qualified their support, e.g. by changing “strongly support” to “support”. Some other minor changes included e.g. changing “I do not see any disadvantages with the proposal” to “There are no disadvantages, it will save lives”. However, the message throughout remained consistent. Any responses which were substantially changed have been treated as individual submissions.

ANNEXE B

List of organisations

No	Name of Organisation	Identifier
1.	20's Plenty for Us	ID: 63971225
2.	Aberdeenshire Council	ID: 62935181
3.	Abernethy Primary School	ID: 58593190
4.	Achaleven Primary Parent Council	ID: 62015312
5.	Alford Primary Parent Council (Aberdeenshire)	ID: 63488171
6.	Alliance of British Drivers	ID: 62011507
7.	Alvie Primary Parent Council Highland	ID: 58622577
8.	Angus Council	9WR: Written Response
9.	Ardersier and Petty Community Council	ID: 58875524
10.	Auchencairn Community Council	ID: 58564735
11.	Auchenshuggle/Tollcross Community Council (Glasgow)	ID: 60497169
12.	Auchterless, Inverkeithny and Fisherford Community Council	3WR: Written Response
13.	Avoch and Killen Community Council	ID: 58850518
14.	Avoch and Killen Community Council	ID: 63138854
15.	Ayr Grammar Parent Council	ID: 60077496
16.	Balfron Community Council	ID: 58848411
17.	Balmaghie Community Council	ID: 61749200
18.	Banff Academy Parent Council	ID: 61892903
19.	Barrhead High School Parent Council	ID: 58751571
20.	Beaully Community Council	ID: 59134754
21.	Belmont, Kincaidston and St Leonards Community Council	ID: 58810210
22.	Birkhill Primary School Parent Council	ID: 58591633
23.	Bishopmill Primary Parent Council	ID: 62045059
24.	Blairgowrie & Rattay Community Council	ID: 57702536
25.	Blairhall Primary School Parent Council	ID: 59519818
26.	Bo'ness Public School Parent Council	ID: 59775898
27.	Bonnyrigg Primary School Parent Council	ID: 62124663
28.	Braidhurst High School Parent Council	ID: 61588391
29.	Brake	ID: 63888649
30.	Broxburn Academy Parent Council	ID: 59648172
31.	Burnfoot Community Council	ID: 58624758
32.	Burnmouth Community Council	ID: 59093806
33.	Busby Parent Council	83WR: Written Response
34.	Castletown Community Council	ID: 60464505
35.	City of Brechin District Community Council	13WR: Written Response
36.	City of Edinburgh Council	ID: 61964723
37.	Cockenzie & Port Seton Community Council	14WR: Written Response

No	Name of Organisation	Identifier
38.	Comhairle nan Eilean Siar	ID: 63819699
39.	Conon Bridge Community Council	ID: 61023404
40.	Cranhill Community Council	ID: 60843593
41.	Creich and Flisk Community Council	ID: 60225529
42.	Croy & Culloden Moor Community Council	15WR: Written Response
43.	Cruden Bay Community Council Aberdeenshire	ID: 57705708
44.	Currie Community Council	16WR: Written Response
45.	Cycle Stirling	ID: 61727220
46.	Cycling Scotland	17WR: Written Response
47.	Cycling UK	ID: 63852612
48.	Cycling UK Scotland	18WR: Written Response
49.	Dalneigh Primary Parent Council	ID: 60015148
50.	Deerpark Primary Parent Council	ID: 58953730
51.	Denholm & District Community Council	ID: 61553277
52.	Dennistoun Community Council	ID: 61779230
53.	Dervaig Primary School	ID: 62108179
54.	Dounby Community School Parent Group	ID: 58828326
55.	Dufftown and District Community Council	ID: 62955003
56.	Dulnain Bridge Community Council	ID: 59373801
57.	Dumfries & Galloway Community Council	28WR: Written Response
58.	Dunbar Community Council	ID: 60382315
59.	Dunlop and Lugton Community Council	ID: 61995681
60.	Dunvegan and District Community Council	ID: 58813697
61.	East Kintyre Community Council	30WR: Written Response
62.	East Renfrewshire Council	ID: 60893450
63.	Edzell Primary School Parents	ID: 62152407
64.	Errol Community Council	ID: 60265945
65.	Eskbank & Newbattle Community Council	ID: 61672796
66.	Evie Community School Parent Council	ID: 59269744
67.	Ferintosh Community Council	ID: 61507252
68.	Fife Council	ID: 59144570
69.	Foyers Primary School Parent Council	ID: 59074959
70.	Free Wheel North	ID: 57726139
71.	Friends of the Earth West Fife	ID: 59501523
72.	Friends of the Earth, Scotland	35WR: Written Response
73.	Glasgow Centre for Population Health (GCPH) & NHS Greater Glasgow and Clyde (GGC)	38WR: Written Response
74.	Glasgow City Council	ID: 61850606
75.	GoBike! Strathclyde Cycle Campaign	ID: 57778881
76.	Golspie Community Council	ID: 63450909
77.	Guide Dogs Scotland	ID: 63618227

No	Name of Organisation	Identifier
78.	Hillside Parent Council	ID: 58622418
79.	Holy Trinity PS	ID: 62128095
80.	Houston Community Council	81WR: Written Response
81.	Huntly Community Council	ID: 58397848
82.	IAM RoadSmart	ID: 63941623
83.	Inverbrothock Primary School Parent Council	ID: 58774301
84.	Inverurie Community Council	ID: 59552326
85.	Isle of Arran Community Forum	ID: 58903289
86.	James Aiton Primary School Parent Council	ID: 58846922
87.	Keig School	ID: 58792969
88.	Killearn Community Council	ID: 59788051
89.	Kilmaurs Community Council	ID: 57873458
90.	Kiltarlity Community Council	ID: 62122690
91.	Kincardine Community School	ID: 59501243
92.	Kinneff Primary School Parent Council	ID: 58864620
93.	Kinross Primary Parent Council	ID: 61816682
94.	Kintyre Crime Prevention Panel	ID: 57853949
95.	Kippen Community Council	85WR: Written Response
96.	Kirkpatrick Fleming District Community Council	46WR: Written Response
97.	Kirkwall and St Ola Community Council	ID: 61374539
98.	Kirriemuir Landward East Community Council	86WR: Written Response
99.	Knightswood Community Council	47WR: Written Response
100.	Ladywell PS Parent Council	ID: 61556180
101.	Lairg Community Council	49WR: Written Response
102.	Linwood Community Council	50WR: Written Response
103.	Living Streets Edinburgh Group	ID: 63894131
104.	Living Streets Scotland	ID: 60515779
105.	Livingston Village Community Council	51WR: Written Response
106.	LMPS Parents Group	ID: 61556755
107.	Lochdar Community Council	ID: 59758337
	Lochmaben Community Council – see 146 and 147	
108.	Lochwinnoch Community Council	82WR: Written Response
109.	Longridge Primary School Parent Council	ID: 58761516
110.	Lossiemouth Community Council	ID: 59844934
111.	Marchmont and Sciennes Community Council	ID: 58215097
112.	Maryhill and Summerston Community Council	ID: 59201010
113.	Mastrick, Sheddocksley & Summerhill Community Council	ID: 61444658
114.	Merchant City Trongate Community Council	56WR: Written

No	Name of Organisation	Identifier
		Response
115.	Midlothian Council	58WR: Written Response
116.	Mintlaw & District Community Council	ID: 59856825
117.	Montrose Academy	ID: 58632863
118.	Muckhart Community Council	ID: 61696526
119.	Murroes & Wellbank Community Council	ID: 59525494
120.	MW Brunsdon Radiocommunications	ID: 59740761
121.	New Cumnock Community Council	ID: 59325863
122.	New Elgin Primary School Parent Council	ID: 58775287
123.	Newcastleton Community Council	ID: 59228142
124.	Newtongrange Community Council	59WR: Written Response
125.	NHS Greater Glasgow & Clyde - see also 73	ID: 58570423
126.	NHS Health Scotland	ID: 63837097
127.	North Berwick Community Council	ID: 62128121
128.	Northmuir Primary School Parent Partnership	ID: 59068045
129.	Oban High School Parent Council	ID: 61365613
130.	Old Kilpatrick Community Council	87WR: Written Response
131.	Orkney Islands Council	ID: 58316269
132.	Oyne Parent Council	ID: 63914967
133.	Paisley East & Whitehaugh Community Council	ID: 61091738
134.	Palnackie Primary Parent Council	ID: 63506163
135.	Paths for All	ID: 61902562
136.	Partick Community Council	60WR: Written Response
137.	Pedal on Parliament	ID: 63883154
138.	Phil Jones Associates Ltd	ID: 59684036
139.	Playing Out CIC	ID: 59982076
140.	Pollokshaws & Eastwood Community Council	ID: 58894876
141.	Pollokshields Trust	63WR: Written Response
142.	Queensferry Primary School Parent Council	ID: 58720747
143.	RAC	88WR: Written Response
144.	Ramblers Scotland	ID: 63285813
145.	Renfrewshire Council	65WR: Written Response
146.	Roslin & Bilston Community Council	ID: 59450477
147.	Royal Burgh of Lochmaben Community Council	79WR: Written Response
148.	Royal Burgh of Lochmaben and District Community Council	ID: 58561703
149.	Royal College of Paediatrics and Child Health Scotland	64WR: Written Response
150.	Scottish Borders Council	70WR: Written Response

No	Name of Organisation	Identifier
151.	Scottish Cycling	ID: 60039050
152.	Sgoil Uig Parent Council	ID: 58665746
153.	Shapinsay Community Council	89WR: Written Response
154.	Shetland Islands Council	ID: 59690119
155.	Social and Public Health Sciences Unit, University of Glasgow	ID: 63509014
156.	South Lanarkshire Council - Underbank Primary School	ID: 61879054
157.	Spean Bridge, Roy Bridge and Achnacarry Community Council	ID: 62102607
158.	Spokes, the Lothian Cycle Campaign	ID: 63834766
159.	St Abbs Community Council	ID: 60505599
160.	St Andrew's First Aid	ID: 57754664
161.	St Andrew's Primary School Parent Council	ID: 58626978
162.	St Andrew's RC Primary School Parent Council	ID: 58716867
163.	St Andrew's School Parent Council	ID: 63845752
164.	St Fillan's Primary School Parent Council	ID: 58774355
165.	St John Ogilvie RC Primary School Parent Council	ID: 62138025
166.	St Johns Town of Dalry Community Council	ID: 60163459
167.	St Luke's Primary School, Kilwinning	ID: 60009361
168.	St Patrick's Primary School, Denny Parent Council	ID: 61789694
169.	Stirling Council	72WR: Written Response
170.	Stow Community Council and Stow Road Safety Campaign, Scottish Borders	ID: 61966604
	Strathclyde Cycle Campaign – see 75	
171.	Strathmartine Community Council	ID: 60717744
172.	Sustrans Scotland	77WR: Written Response
173.	Tap o' Noth Community Council	78WR: Written Response
174.	Tarradale Parent Council	ID: 62890926
	The Royal Burgh of Lochmaben and District Community Council – see 147 and 148	
175.	Tomintoul Primary School Parent Council	ID: 59484082
176.	Torry Community Council	ID: 59051879
177.	Transform Scotland	ID: 61905818
	Twenty's Plenty – see 1.	
178.	Ulva Primary Parent Council	ID: 62048997
	Underbank Primary School – see 156	
179.	Wallacewell Primary Parent Council	ID: 58720321
180.	West Coats Parent Council Road Safety Team	ID: 62991917
181.	Westcotec Traffic Safety Systems	ID: 60358687
182.	Whiting Bay Primary School Parent Council	ID: 63980087