

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

RESTRICTED ROADS (20 MPH SPEED LIMIT) (SCOTLAND) BILL

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Road Safety and Road Crime have been key priorities for Police Scotland since its inception in 2013 and remain a firm focus as we plan for the next year ahead. Like any public agency we have finite resources, and so must deploy our Police officers and Safety Camera Unit staff in an intelligent and targeted way to maximise the potential opportunities for casualty reduction. Public support for such activities is crucial also and if seen to be overly punitive or misconceived as a revenue-raising exercise, will fall into disrepute.

Our information and intelligence products are developed in collaboration with the 32 local authorities, trunk road operating companies and other Road Safety partners. We continuously analyse collision (Killed & Seriously Injured – KSI) and road traffic offences data, giving careful consideration to the number, severity and cause of each injury collision, and routes that attract higher offending rates e.g. speed surveys. This approach assists in identifying the areas which present the greatest risk, and allows us to determine the best tactical options, e.g. speed enforcement, road checks (with or without DVSA), engineering solutions, automatic number plate recognition sites et cetera.

Speed enforcement activities tend to focus on suburban and rural roads (including single carriageway trunk roads) where speed limits are higher due to lighter traffic flows, and where vulnerable road users may be at greatest risk due.

Urban KSI incidents are more typically linked to other causation factors such as 'fail to look' by pedestrians and motorists, albeit when collision speeds are higher and/or the vehicles are larger, the outcomes are likely to be more damaging. Regardless of a posted speed limit, where there is an evidenced casualty profile where inappropriate speed is a contributory factor, Police officers and/or Safety Camera operatives (within the conditions set out in the Scottish Safety Camera Programme Handbook) will deploy and carry out enforcement.

I am firmly of the view that the carefully considered and engineered implementation of 20 MPH zones at specific sites, e.g. at or near schools, near pedestrianised, night-time economy zones etc., is a valuable tactic in reducing road casualties. I also believe that speed compliance within those zones should be achieved and sustained by means of the existing road layout or other physical/vertical engineering measures such as chicanes or road humps. Wherever possible, 20 MPH zones should be 'self-enforcing' and seen to be appropriate by a significant majority of motorists.

Whilst I acknowledge the clear merit of the Scottish Green Party's desire to reduce the default speed limit for restricted roads I do have some concerns that motorist compliance with existing 20 MPH zones is generally poor, particularly in those schemes that do not have 'self-enforcing' features. Indeed, the very recently published Department for Transport (DfT) report on 20 MPH limits (22 November 2018) illustrates that average speeds have dropped by less than 1 MPH following implementation, with almost half of drivers found to be exceeding the 20 MPH speed

limit. This is of concern, particularly given most of the schemes examined by the report typically had pre-intervention average speeds of less than 24 MPH.

The DfT report further highlights the public's perception that 20 MPH limits are not routinely enforced and consequently, motorists do not think they will be caught by a Police 'speed trap'. These views and behaviours present a challenge to enforcement given that Police Scotland is not resourced to greatly increase speed detection operations in communities should a more widespread 20 MPH limit be implemented nationally. Our methodology must remain focused on where we can make the greatest difference in reducing KSI incidents and that is typically not in urban zones but on suburban and rural routes where traffic speeds are higher.

In terms of speed limit enforcement, nothing will demonstrably change following introduction of a 20 MPH limit. There will be no additional Police speed detection patrols, unless specifically funded and for a limited time, and neither will there be blanket re-tasking of existing Road Policing resources currently dedicated to known casualty and road crime hotspots as described above. Nor will Safety Camera Unit operatives be extensively re-tasked to more urban sites, due to the rules that govern their deployment which is very much casualty-led and evidenced-based.

Our Local Policing divisions have some Community Policing resources who are trained and equipped for 'hand-held' speed detection activities, and they may be involved in ad hoc education/enforcement activities, but again, balanced against the myriad of other demands upon their services, e.g. focus on night time economy, drug dealing, shoplifting and responding to emergency calls. A small Community Policing Team has limited capacity to regularly deploy to static speed detection sites which are safe and suitable. Our experience within the enforcement of 20 MPH zones in the City of Edinburgh further evidences this where we have struggled to manage public and political expectations. These operational decisions may lead to disappointment of public and politicians who expect to see enforcement when new 20 MPH zone are implemented and may not understand the evidence-based decisions behind our current deployment priorities not accept that resources are finite.

Notwithstanding the challenges of satisfying all stakeholders, this proposed Bill will undoubtedly provide an opportunity for road planners and road safety partners to think more strategically in the next decade. There are other models of speed limit setting, for example in Europe, where the limits are based upon the type of road and location so drivers 'know' by their location, the type of road on which they are driving what the speed limit is and kept more simple. Scotland might consider following a simplified model of 30, 50, 70 MPH limits, setting the national speed limit (except non-urban motorways and some dual carriageways) at the lower limit of 50 MPH (not 60 MPH) which on the KSI evidence we have, may give the greatest benefit to reducing these incidents on suburban and rural roads. This would not prevent continued introduction of specified 20 MPH zones around schools or other high-risk/high-footfall locations.

Ultimately, the solution to inappropriate speeding lies in new vehicle technologies. While the human element of the driving experience still has the autonomy to 'press the pedal' and travel in excess of the posted limits, they will do so, and face the consequences of poor decision making and unnecessary risk-taking.

I trust this submission is helpful to develop the Parliamentary Committee's research into the Bill laid before the Scottish Parliament.

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