

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

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

SUBMISSION FROM ROAD HAULAGE ASSOCIATION LTD

• Is reducing the speed limit to 20mph the best way of achieving the aims of the Bill?

The current system of 20mph around schools, hospitals, residential areas and known “hot spots” is there to protect the most vulnerable amongst us and seems to be working well. The Bill appears to be very broad brush which will encompass areas where there does not seem to clearly identify problems which will add cost and additional administrative burdens onto already stretched local authorities.

We have not seen any evidence to suggest that emissions levels for HGV's would be any lower at 20mph than they are at 30mph, but we accept that there may be reduced tyre wear etc which could positively affect particulates levels.

Most of the studies and evidence produced has come from the larger cities and so it becomes difficult to make comparisons, and so it brings us back to where we know there are known hot spots. Surely dealing with them rather than a blanket approach would be more appropriate? It makes complete sense that speed limits within residential housing schemes with limited visibility are reduced but sparsely populated roads with good visibility (which may be categorised the same) would perhaps have less requirement. Are over stretched local authorities best placed to make a decision on that or would they take a blanket approach for easiness? Wrongly categorising roads could potentially lead to increased driver frustration which we know from other studies can lead to poor driver behaviour and decision making in all vehicle types.

Only time would tell. Everyone wants safer roads, we are just not completely convinced that this blanket approach would give us the desired chance.

• How will the 20mph Bill affect you?

Under the current system there is little requirement for HGV's to be on residential roads, other than school/hospital deliveries or the occasional residential delivery. However, it is highly unlikely that HGVs will be able to or will want to exceed 20 mph in what are usually confined spaces. This is under the current mandatory 30mph (20mph in some local authorities) or voluntary 20 mph system. There is an absolute and clear understanding of why the speed limit needs to be different in these streets. The current 20 mph by exception alerts drivers to potential safety hazards and causes drivers to take more care. Expanding this to include all restricted roads (a blanket approach) may detract from these alerts.

It is essential that Councils review their roads hierarchy to set out which roads will be exempt in the proposed new system. It is difficult to gauge how much of an impact this will have until we know which roads are to be affected.

• Should Police Scotland be required to take additional enforcement action, over and above that used to enforce the current 30mph limit, following the introduction of a default 20mph limit on restricted roads?

There are real questions surrounding enforcement and cost. Police Scotland are incredibly stretched already and surely patrolling known hotspots is the best use of their resource? If they are unable to patrol across the board then it would be assumed that additional speed camera's etc would be required which adds to the cost of the project along with cost of the new signage. There would have to be enforcement, and subsequent prosecutions to facilitate the cultural change.

• What kind of timescale is needed for the 20mph speed limit to be introduced?

The longer lead time the better in order to get the message across and make it clear which roads would be affected. This should take in to account the time required for all local authorities to review their roads hierarchy and set out which roads are proposed to change.

• Do you have any comments on the impact that the Bill might have in relation to the following:

➤ **human rights or equalities for any particular group of people?** No comment

➤ **sustainable development?** No comment

➤ **island, rural or remote communities?** No comment