

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

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

SUBMISSION FROM SCOTS (the Society of Chief Officers for Transportation in Scotland)

Introduction

1. This response from SCOTS (the Society of Chief Officers for Transportation in Scotland) is in regard to the Restricted Road (20mph Speed Limits) (Scotland) Bill introduced by Mark Ruskell MSP on the 21st of September 2018.
2. SCOTS is the strategic body comprising of transportation professionals from all the 32 councils and the seven regional transport partnerships.
3. The purpose of the response is to provide SCOTS' views to the Rural Economy and Connectivity Committee of the Scottish Parliament on the proposed Bill.

SCOTS' Current Position

4. It is accepted that a reduction in speed leads to improvements in road safety and decreased likelihood and severity of incidents. SCOTS is therefore in general agreement with the principle of the Restricted Road (20mph Speed Limits) (Scotland) Bill.
5. The Bill is consistent with the long-standing National Government commitment to progress to a situation where the default in the built-up area becomes 20mph limit.
6. It is considered that the Bill if passed and enacted would represent decisive and substantive action in improving road safety nationally which would be delivered at a local level.
7. It is also considered that the introduction of 20mph speed limits can have positive effects societal and environmental outcomes, for example on revitalising some of our streets and communities and encouraging more proactive placemaking, and in reducing emissions.
8. It is however accepted that there will be a cost, both financially and in staff time, for the implementation of the Bill for Local Authorities. The requirements of the Bill would also potentially divert staff resources from other transportation activities.
9. SCOTS has provided support to the development of costs for the physical implementation of the signage and lining used in the Financial Memorandum that accompanies the Bill. It is accepted that the SCOTS Cost Report was based on a small sample of local authorities due to time and resource constraints. The report was also based largely on data provided by authorities that have already progressed with implementing 20mph speed limits under current provisions. SCOTS will continue to work with other national bodies to provide robust evidence on the costs that would apply to traffic authorities if the Bill is passed.

10. As shown in the SCOTS Cost Report that was referenced in the Financial Memorandum that accompanies the Bill, the funding of implementation phase of replacing and installing new road signage, including lining, will be substantial for each and every local traffic authority. This is considered by SCOTS to be largely additional costs, as to date the processing of 20mph speed limits has been at the discretion of individual local authorities.
11. Further, the cost of implementation will be preceded by a planning stage that will require resources to be applied by local traffic authorities that are also largely additional costs, for the same reason.
12. The planning stage will require a full study of the local road network to assess the requirements for new and removal/modification of existing signage, lining, and possible associated engineering measures.
13. The planning stage will also require the processing of all necessary Traffic Regulation Orders, including consultation and processing. There may be a need to process a significant number of Temporary Traffic Regulation Orders so as to allow the 20mph default speed limit to apply from a nationally set date.
14. It is not clear if the Bill will lead to an improvement or simplification in the process of implementing Traffic Regulation Orders for Local Authorities.
15. The success of the Bill will also be dependent on the delivery of a considerable and lengthy public information campaign at a national level, which needs to include and be coordinated with local community engagement from local authorities and Police Scotland.
16. The 20mph speed would become the default for enforcement as the 30mph is currently, and Police Scotland's responsibility to enforce the default speed limit would remain. However, the success of the Bill will also be dependent on the direct support and involvement of Police Scotland throughout the process, and most importantly in the initial enforcement stage.
17. It is considered that the timetable for implementation should the Bill be enacted into law needs to be extended. The Bill as currently structured would have the Bill come into force within 18 months of Royal Assent. This would put additional pressure upon Local Authorities and may lead to duplication of effort and wasted resources to correct Traffic Regulation Orders and alter physical signage and lining.
18. It is also considered that too short a period from Royal Assent will limit the opportunities to consider how the introduction of the default 20mph speed limit could help in revitalising some of our streets and communities and encouraging more proactive placemaking. Further and more specifically, the Transport (Scotland) Bill to prohibit the parking of vehicles on pavements and prohibit double parking is also being progressed through Parliamentary process. It is important to realise that the progression of both these Bills will require similar if not the same staff capability and capacity in local authorities to deliver.

19. It is considered that it would be more beneficial for a longer lead in time to be attached to the Bill to allow for a collaborative approach for Local Authorities, Transport Scotland and Police Scotland to be initiated which would enable a smooth transition for all parties including motorists.

Conclusions

20. SCOTS broadly supports the aspirations of the Bill and we acknowledge the work that has been undertaken by Mark Ruskell MSP. SCOTS reserves the right to amend its current positions as the Bill progresses. This is due to a range of views being expressed by the SCOTS membership around the costs and the practicalities of implementing this change of law. We firmly believe that more work on reconciling the practical and financial challenges that this Bill may bring for Local Authorities is necessary to allow for the concerns of SCOTS to be addressed. SCOTS will continue to work collaboratively with partners such as COSLA and Transport Scotland throughout the life of the Bill.