

**RURAL ECONOMY AND CONNECTIVITY COMMITTEE
RESTRICTED ROADS (20 MPH SPEED LIMIT) (SCOTLAND) BILL**

SUBMISSION FROM FIFE COUNCIL

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

Whilst the aims of the Bill are laudable, the actual delivery of the Bill is unnecessary in terms of cost, disruption, diversion of scarce resources and will lead to potential road user confusion.

Fife Council has completed the roll out of 20mph zones covering the majority of streets that would be included in this Bill using the existing powers of Traffic Regulation Orders (TROs) together with a significant investment in appropriate physical traffic calming features. In that regard Fife has now achieved the majority of the benefits of the policy approach of the Bill but without the need for any further expenditure.

Rather than implement a blanket change, to achieve the same result throughout Scotland it would be helpful for the Traffic Regulation Order (TRO) procedure to be simplified, at least for 20mph speed limits on restricted roads, as the process of implementing the currently necessary TRO's may be seen as an impediment to Local Authorities. There are a number of traffic management measures which no longer require Orders (including box junction and bus stop clearway) - being able to promote 20mph zones Orders without going through the current TRO process would have benefits for Roads Authorities who have still to implement area treatment using 20mph speed zones/limits. This option would allow 30mph speed limits to be retained where appropriate on restricted roads without further costs being incurred and would avoid the wholesale removal of 20mph speed limit signs in Fife, Edinburgh and the other locations in Scotland where 20mph speed zones/limits are in already widely in place.

Investment in associated traffic calming infrastructure has proved its worth in Fife and is necessary if 20mph speed limits are to be at least partially self-enforcing. Evidence from Edinburgh and the Twenty's Plenty low cost trial in the early 1980's indicated that signing alone tended to only lead to speed reductions of between 1mph-1.5mph. In Fife where traffic calming features have been widely implemented the speed reductions within 20mph zones have generally been in the range of 6mph-8mph. On that basis, by only implementing 20mph signs and not providing associated engineering measures, the aims of the Bill will not be achieved and such speed limits could be held in disrepute.

The Bill is likely to result in significant confusion for road users many of whom will be unclear of the difference between road classifications by creating an anomaly at restricted roads where a 30mph speed limit will still require repeater signs whilst for a

similar speed limit on A & B class roads it does not. Typically road users are not aware of the distinction between A, B, C and unclassified roads and therefore a consistent policy application is important. This could be resolved by having a requirement for a consistent approach to repeater information across all road types.

How will the 20mph Bill affect you?

The Bill would cause a significant amount of disruption, cost and an unnecessary diversion of hard pressed road safety resources away from higher priorities. Fife already has an extensive network of 20mph zones covering the roads referred to in the Bill so the proposed changes would not provide any improvement at all in 20mph coverage.

The Bill would have a significant financial implication for Fife due to the need to remove 20 mph speed limit repeater signs on restricted roads across all our school, residential and town centre areas. Fife currently has 499 20mph zones and estimating using an average cost of £3,000–£6,000 for a works team to visit a zone to adjust/remove signage and carry out re-instatements will result in a bill of between £1.5m–£3m. This is a significant cost without a cost benefit.

It would create an inconsistency as 20mph repeater signs would still be in place on A and B class roads adjacent to some restricted roads - the potential for driver dubiety over the speed limit could increase with a potential negative impact on safety. Such confusion must be avoided.

In Fife and nationally the costs of promoting TRO's to retain 30mph speed limits on restricted roads and the follow-on signing required on these roads is an unnecessary cost, again with no cost benefit. Fife currently has 191km of restricted road with a 30mph limit in place which would remain and require promotion of TRO's and new signage infrastructure provided. As a rough estimate, at least a further £1 million would be required to cover the costs of consulting, promoting TRO's and implementing the required new 30mph signage on site.

It is proposed that a national awareness campaign is required to introduce a 20mph speed limit. Do you agree with this? And if so – what shape should any campaign take?

If the Bill is implemented and the implementation costs can be met then an extensive national awareness campaign would be required across all sections of media to ensure wide coverage repeatedly over many years. There is low confidence in this providing the necessary culture change, with higher priorities for road safety such as rural roads and drink/drug driving. These are really the top priority areas requiring a higher level of sustained road safety campaigns.

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?

Ensuring that the 20mph limit is reasonably self-enforcing, using appropriate traffic calming features, is essential to ensure lower speeds. This reduces what would otherwise be a significant burden on the Police in delivering comprehensive enforcement action. There is low confidence that Police Scotland could resource the required level of enforcement to sustain the new limits without physical engineering features. On that basis, the philosophy of delivering the Bill is flawed

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

Firstly, there is no benefit to Fife from this Bill. If the funding is to be provided wholly by Scottish Government then a timescale of 2–3 years might be achievable, however it should be pointed out that this will cause significant disruption to road users and place a significant workload on small local authority teams that are already under great pressure. If it is to be funded by Local Authorities then a timescale of 10 years plus and a very inconsistent application across Scotland.

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?**

N/A in Fife as very little/no change from the current provision.

➤ **Sustainable development?**

N/A in Fife as very little/no change from the current provision.

➤ **Island, rural or remote communities?**

N/A in Fife as very little/no change from the current provision.

Is there anything else that should be included or excluded from the Bill?

This legislation is not required in Fife since the aims have already been achieved through the existing large 20mph network. On that basis this Bill should not proceed.

Should it be decided that this Bill is to be enacted regardless of the views of Fife Council and others, then a package of funding from Scottish Government to cover the costs to Local Authorities of implementing the measures is required. A cost of between £1.5m–£3m for changing signage within existing Fife 20mph zones together with another £1m for implementing the retention of the existing 30mph limits on restricted roads.

While Fife supports the aims of the Bill and the ability to retain the 30 mph speed limit on some roads, it would be helpful, in terms of the process, if restricted roads which were to retain the 30 mph speed limit could be named as part of the introduction of the Bill. This would remove the lengthy TRO process to re-establish 30 mph speed limits. As the Bill seeks to remove the TRO burden from those wishing

to reduce speed limits to 20 mph, it is inappropriate to require a TRO procedure to retain a 30 mph speed limit.

The Bill should have a provision to ensure that 20mph limits are self-enforcing and neither relying on police enforcement nor marketing campaigns.