

**Mobility and Access Committee for  
Scotland (MACS)**

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Rural Economy and Connectivity Committee

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Our ref:  
2018/22

Date:  
11 December 2018

**EVIDENCE ON THE RESTRICTED ROADS (20 MPH SPEED LIMIT) (SCOTLAND) BILL**

Please find attached a submission forms provide by the Mobility and Access Committee for Scotland.

Yours sincerely,

**Keith Robertson**

# SUBMITTING EVIDENCE TO A SCOTTISH PARLIAMENT COMMITTEE

## DATA PROTECTION FORM

<b>Name:</b>	Keith Robertson
<b>Date:</b>	11 December 2018
<b>Organisation: (if required)</b>	Mobility and Access Committee Scotland (MACS)
<b>Topic of submission:</b>	RESTRICTED ROADS (20 MPH SPEED LIMIT) (SCOTLAND) BILL

I have read and understood the privacy notice about submitting evidence to a Committee. Yes

I am happy for my name, or that of my organisation, to be on the submission, for it to be published on the Scottish Parliament website, mentioned in any Committee report and form part of the public record. Yes

I understand I will be added to the contact list to receive updates from the Committee on this and other pieces of work. I understand I can unsubscribe at any time. Yes

### Non-standard submissions

Occasionally, the Committee may agree to accept submissions in a non-standard format. Tick the box below if you would like someone from the clerking team to get in touch with you about submitting anonymously or for your submission to be considered but not published. It is for the Committee to take the final decision on whether you can submit in this way.

I would like to request that my submission be processed in a non-standard way.

## RURAL ECONOMY AND CONNECTIVITY COMMITTEE

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

#### SUBMISSION FROM Keith Robertson, Mobility and Access Committee Scotland (MACS)

- **How will the 20mph Bill affect you?**

MACS believes that the speed reduction to 20 mph in busy streets and residential areas will make these roads safer for disabled pedestrians.

However, the Committee has some concerns about the effectiveness of the speed limit reduction - according to recent research by Department for Transport (DfT) there is no evidence that the scheme reduces collisions or casualties in residential area.<sup>1</sup>

This is further supported but, a report from Bath and North East Somerset Council where the sum of £870.000 was spent on 13 speed reduction areas and the number of accidents and injuries actually increased.<sup>2</sup>

As consequences of these reports of November 2018 and December 2017, MACS has concerns that the recent 'DfT/Atkins research "found no evidence" that 20mph sign-only schemes reduces accidents in general' and consequently may not have the desired effect that Government wishes. That being the case we would ask for this proposal to be reviewed as the large costs involved may be better spent on other speed reduction processes and the much needed replacement of items like the older Pelican and Zebra crossings.

We would also like to add a precautionary note that road authorities must not use a reduction in speed limits on the busy streets as a medium to reducing accessibility. It is important that streetscapes, crossings, etc., be still maintained to an acceptable standard.

- **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?**

Should this go ahead we believe that a national awareness campaign is imperative if 20mph speed limits have to be introduced on a more national basis than at present. It is important that this campaign is delivered in a range of formats that are accessible to all disabled people.

Further, the importance of engagement with community groups and individuals, including disabled people and disabled people's organisations of each proposed reduction of traffic speed.

It is also imperative that any equality impact assessment is carried out for each proposed street or groups of streets is carried out to identify any possible impact, both negative and positive, on people with protected characteristic.

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<sup>1</sup> Available at: <https://www.transportxtra.com/publications/local-transport-today/news/59629/no-evidence-that-20mph-limits-cut-casualties-says-dft-study>

<sup>2</sup> Available at: <https://www.telegraph.co.uk/news/2017/12/17/20mph-limit-dangerous-costly-reverse-council-admits/>

- **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?**

MACS would suggest that in the first few weeks following the proposed introduction of reduced speed limits additional and increased enforcement should be taken. However, thereafter we believe that Police Scotland should adopt their normal practice of focusing on streets identified as a problem, and see no need to change the enforcement of speed restrictions than is enforced at present.

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

We would suggest that the public require reasonable notice of the introduction of new speed limits to give them time to absorb the information. The introduction of possible new speed limits should be introduced only after the awareness campaign for that individual speed reductions has taken place.

We believe that there should be a national campaign informing people that this may be happening in their own areas. However, we also believe that local information campaigns must be undertaken for the particular areas in individual local reductions.

The responsibility for monitoring local information campaigns for the reduction of speed limits should remain with Scottish ministers to ensure that they are qualitative and delivered in a number of formats that are accessible to all.

- **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?**

We do not believe that this will encroach on anyone's human rights or equalities.

- ✓ **Sustainable development?**

MACS believes that the reduction to 20 mph speed limit in busy streets and busy residential areas may have a positive effect on sustainable development, if people are aware of where they are and the implications of the limits, especially in heavy built up residential areas. People tend to react more positively if they physiologically feel safer in their surroundings.

- ✓ **Island, rural or remote communities?**

If 20 mph speed reductions are only to be introduced in busy streets of busy residential areas then we are at a loss to see why this will have any affect on island, rural or remote communities except in areas that have a high concentration of population.

- **Is there anything else that should be included or excluded from the bill?**

MACS believes that if 20mph speed limits are introduced then they should apply to all forms of transport, including bicycles, and not just motorised vehicles. For example, "In 2016 three pedestrians died across Great Britain while a further 108 sustained serious injury after being hit by cyclists<sup>3</sup>". The position should also be established with regard to electric scooters, which are beginning to emerge as safety issues in many cities.

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<sup>3</sup> See: <https://www.telegraph.co.uk/news/2017/09/14/pedestrian-73-dies-collision-cyclist/>

# SUBMITTING EVIDENCE TO A SCOTTISH PARLIAMENT COMMITTEE

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<b>Name:</b>	Keith Robertson
<b>Date:</b>	11 December 2018
<b>Organisation: (if required)</b>	Mobility and Access Committee Scotland (MACS)
<b>Topic of submission:</b>	RESTRICTED ROADS (20 MPH SPEED LIMIT) (SCOTLAND) BILL, Financial Memorandum

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Yes to all the above

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**FINANCE AND CONSTITUTION COMMITTEE  
RESTRICTED ROADS (20 MPH SPEED LIMIT) (SCOTLAND) BILL FINANCIAL  
MEMORANDUM  
SUBMISSION FROM**

1. **Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?**

Yes we did comment on the proposed introduction of 20mph speed limits but did not really comment on the financial repercussions.

2. **If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?**

The financial assumptions are not an issue for MACS to comment on. However, given the most recent research from Department for Transport (DfT) we do have some concerns that funds are being spent wisely. This research published at the end of November 2018 states quite categorically that 20mph speed limits have no affect on roads accidents, injuries or fatalities:

<https://www.transportxtra.com/publications/local-transport-today/news/59629/no-evidence-that-20mph-limits-cut-casualties-says-dft-study/>

Given these recent revelations, we ask Government to consider if this is the best method of making our busy streets and residential areas safer or are funds better spent on other areas that would make our busy roads and streets safer for disabled people?

3. **Did you have sufficient time to contribute to the consultation exercise?**

Yes

**Costs**

4. **If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.**

There are no cost implications to MACS.

5. **Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?**

N/A

6. **If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?**

N/A

7. **Does the FM accurately reflect the margins of uncertainty associated with the Bill's estimated costs and with the timescales over which they would be expected to arise?**

N/A

## **Wider Issues**

- 8. Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?**

Not an issue that MACS is able to comment on.

- 9. Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs.**

Not an issue that MACS is able to comment on.