

## **Proposed Restricted Roads (20mph Limit) (Scotland) Bill Consultation**

### **Cycling Scotland Submission**

**August 2017**

Cycling Scotland welcomes the opportunity to comment on proposals for a national 20 mph speed limit on restricted roads. Our key points are:

- Traffic speed and behaviour is one of the main barriers to people cycling. 20 mph will help improve safety for people cycling, and all road users.
- Any legislation must be supported by effective enforcement and driver education and awareness raising to instigate required levels of cultural change whereby slower speeds become the norm in built-up areas.
- Lower speed (i.e. 20 mph) not only improves safety but has a range of other benefits including for the environment, health, and the economy.
- With rapid technological change in vehicles, the opportunities for technology to change driving behaviour should be examined
- Local Authority and Police capacity constraints need to be addressed as this proposed legislation develops

Cycling Scotland is the nation's cycling organisation. Working with others, we help create and deliver opportunities and an environment so anyone anywhere in Scotland can cycle easily and safely. Our vision is for a sustainable, inclusive and healthy Scotland where anyone anywhere can enjoy all of the benefits of cycling.

#### **Question 1 – Which of the following best expresses your view of the proposal to replace the current 30mph default speed limit on restricted roads with a 20mph limit?**

- Fully supportive
- Partially supportive
- Neutral (neither support nor oppose)
- Partially opposed
- Fully opposed
- Unsure

**Please explain the reasons for your response.**

Fully or partially supportive.

Concern over traffic travelling too fast is a significant barrier to cycling. Latest figures from the 2017 Annual Cycling Monitoring Report highlight that such a concern was stated by 11.5% of people as a reason for not cycling. A further 8.8% identified 'inconsiderate driving' as a barrier. The main source of collisions is in built-up areas, with vehicles travelling up to 40 mph, accounting for 88% of all collisions involving a bicycle where an injury was reported<sup>1</sup>.

Several studies have demonstrated a link between the introduction of 20 mph speed restrictions and a subsequent reduction in casualties. The risk of serious injury or death for people cycling (and for pedestrians) increases disproportionately as speed increases. A pedestrian hit at 40 mph has a 31%

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<sup>1</sup> Cycling Scotland (2017) Annual Cycling Monitoring Report 2017

chance of death; if they are hit at 30 mph, this falls to 7%; and at 20 mph, the risk is negligible<sup>2</sup>. Also, lowering the speed limit to 20 mph has been shown to decrease the proportion of accidents involving children by as much as 70%. It is recognised that children cannot correctly judge the speed of traffic before the age of 12, and children living in areas of deprivation are more likely to be injured in road crashes<sup>3</sup>. There is also evidence that shows in areas where a 30 mph speed limit had previously been in place, lowering the limit to 20 mph may help save lives. This has been argued to be particularly true for disadvantaged areas and communities, and could thus help reduce inequalities in accident and casualty rates<sup>4</sup>.

20 mph speed restrictions will help to improve the safety of people cycling, by making the road environment safer and more cycle-friendly, encourage more people to travel actively, and improve safety for all road users.

**Question 2 – Could the aims of this parliament be better delivered in another way (without a Bill in the Scottish Parliament)?**

- Yes (if so, please explain below)
- No
- Unsure

**Please explain the reasons for your response.**

Yes

There is a need for legislation to ensure compliance with 20 mph speed restrictions. Examples of the ban on smoking in public places, clearly demonstrate this. Enforcement of legislation must ensure that all road users are treated and protected proportionally across the whole of Scotland. However, it is important that local areas/authorities have both the capacity and scope to respond to specific problems and concerns in their area. A national roll-out of legislation for 20 mph speed restrictions could help to ensure a consistent and fair approach to road safety across the whole country.

Although legislation is required, this should also be supported by effective enforcement and softer measures such as driver education and awareness raising campaigns to instigate required levels of cultural change whereby lower speeds become the norm.

**Question 3 – What do you think would be the main advantages, if any, of the proposal?**

Lower speed limits are not only associated with improvements in safety. There are a wide range of other benefits including positive economic impacts, improved health outcomes, and increased rates of active travel.

Places which apply a 20 mph speed restriction have higher rates of cycling, walking and public transport use. This helps create a more vibrant economy, and a higher quality environment for

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<sup>2</sup> Cycling UK 20 mph: lower speeds, better streets <http://www.cyclinguk.org/campaign/20-mph-lower-speeds-better-streets>

<sup>3</sup> LGiU the local democracy think tank (2013) Area-wide 20mph neighbourhoods: a win, win, win for local authorities <http://www.lgiu.org.uk/wp-content/uploads/2013/12/Area-wide-20mph-neighbourhoods-a-win-win-win-for-local-authorities.pdf>

<sup>4</sup> Dorling, D (2014) 20mph Speed Limits for Cars in Residential Areas, by Shops and Schools [http://www.britac.ac.uk/policy/Health\\_Inequalities.cfm](http://www.britac.ac.uk/policy/Health_Inequalities.cfm)

people to live in<sup>5</sup>. Further, evidence shows that people accessing an area on foot spend two to six times more in local shops and businesses than people accessing an area by car, demonstrating a clear economic benefit<sup>6</sup>.

Findings from Bristol show that introducing speed restrictions in the city resulted in a 20.5% increase in cycling in the city<sup>7</sup>. Further, evidence from Edinburgh, the first Scottish city to roll-out 20 mph speed restrictions across the city centre, show that since 2009, rates of cycling have increased by a quarter. The majority of this increase was between 8 am and 9 am when the roads are traditionally at their busiest during the morning commute. Some 1600 people entered the inner city by bicycle during this time in November 2016<sup>8</sup>, demonstrating the significant impact that speed restrictions can have on rates of cycling and active travel.

One of the main arguments often presented against 20 mph speed restrictions is the longer journey time associated with reduced speed. However, the argument of a longer journey assumes a like-for-like comparison between a 30 mph and 20 mph journey. In reality, very few, if any, journeys through an urban area have a constant/consistent speed. Traffic lights, giving way to parked cars and at junctions, and pedestrians, all cause vehicles to regularly stop and start, resulting in the maximum permitted speed only being reached for a short time. In fact, research shows that urban traffic flow improves at lower speeds<sup>9</sup>.

**Question 4 – What do you think would be the main disadvantages, if any, of the proposal?**

We do not foresee any significant disadvantages arising from the proposal.

**Question 5 – What measures do you think would be needed to maximise compliance with the national 20mph speed limit on restricted roads? (Examples might include advertising, signage or police enforcement).**

There should to be a combination of promotion, signage and effective enforcement to maximise compliance. The exact combination of the measures will be dependent on circumstances and resources in individual local authority areas and enforcement authorities. This will enable a clear identification of what is most effective, where and why, and help to ensure an appropriate response to local circumstances.

A range measures is required to ensure maximum compliance, with different measures more appropriate in different areas and circumstances.

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<sup>5</sup> LGiU the local democracy think tank (2013) Area-wide 20mph neighbourhoods: a win, win, win for local authorities <http://www.lgiu.org.uk/wp-content/uploads/2013/12/Area-wide-20mph-neighbourhoods-a-win-win-win-for-local-authorities.pdf>

<sup>6</sup> European Cyclists' Federation (2010) Halving injury and fatality rates for cyclists by 2020: ECF Road Safety Charter [https://ecf.com/sites/ecf.com/files/ECF\\_Road\\_safety\\_charter.pdf](https://ecf.com/sites/ecf.com/files/ECF_Road_safety_charter.pdf), page 11

<sup>7</sup> LGiU the local democracy think tank (2013) Area-wide 20mph neighbourhoods: a win, win, win for local authorities <http://www.lgiu.org.uk/wp-content/uploads/2013/12/Area-wide-20mph-neighbourhoods-a-win-win-win-for-local-authorities.pdf>

<sup>8</sup> <http://road.cc/content/news/92032-cycle-commuters-all-time-high-edinburgh-across-scotland-car-ownership>

<sup>9</sup> ibid

**Question 6 – Taking into account both costs and potential savings, what financial impact would you expect the proposed Bill to have on**

**(a) Scottish Government**

- Significant increase in cost
- Some increase in cost
- Broadly cost neutral
- Some reduction in cost
- Significant reduction in cost
- Unsure

As stated in the consultation paper, a national roll-out is significantly cheaper than each individual local authority implementing their own roll-outs.

**(b) Local authorities**

- Significant increase in cost
- Some increase in cost
- Broadly cost neutral
- Some reduction in cost
- Significant reduction in cost]
- Unsure

There is likely to be some increase in cost in the immediate to short term with regards to installation of signage, infrastructure, and resources for enforcement. At present, 20 mph limits require that a minimum of one repeater sign must be placed, unless the restriction is less than 200 metres long. It is for local authorities to decide on the appropriate level of repeater signing beyond that, however, local authorities should ensure sufficient repeater signs are placed to inform road users of the speed limit in force. Over the longer-term, a reduction in costs should be expected through cost savings in terms of road maintenance and repairs resulting from improvements to road conditions from less congestion. Further, as the proposed roll-out is at a national level, support and assistance received from central government should help to mitigate some of these costs.

**(c) Motorists**

- Significant increase in cost
- Some increase in cost
- Broadly cost neutral
- Some reduction in cost
- Significant reduction in cost
- Unsure

Motorists are likely to experience some reduction in cost. Driving at a lower and steadier speed reduces fuel consumption and reduces congestion. As a result, cars burn less fuel when idling in traffic, resulting in lower fuel costs for motorists.

Motorists are also likely to benefit from improved journey times associated with lower speeds, and from a reduction in road traffic accidents. There are positive cost impacts associated with both.

**(d) Other road users and members of the public**

- Significant increase in cost
- Some increase in cost
- Broadly cost neutral
- Some reduction in cost
- Significant reduction in cost
- Unsure

Some reduction in cost

**(e) Other public services (e.g. NHS, Fire and Rescue Services etc.)**

- Significant increase in cost
- Some increase in cost
- Broadly cost neutral
- Some reduction in cost
- Significant reduction in cost
- Unsure

With an estimated total cost of £1,130 million (2015)<sup>10</sup>, road traffic accidents place a significant cost burden on the emergency and other public services.

As previously outlined, a reduction in speed is positively associated with a reduction in the rate of road accidents. This is thus likely to lead to a reduction in costs for the emergency services. Fewer accidents mean a reduction in the cost of treating injuries from road accidents, and also to the police and fire rescue service for clearing and re-opening roads, for example, following an accident. It has been argued that a national default 20 mph speed restriction across Scotland could save 940 accident casualties and £56 million per year<sup>11</sup>.

**Question 7 – Do you believe there will be any other benefits to reducing the speed limit from 30mph to 20mph?**

N/A

**Question 8 – What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): age, disability, gender re-assignment, marriage, and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation?**

- Positive
- Slightly positive
- Neutral (neither positive nor negative)
- Slightly negative
- Negative
- Unsure

**Please explain the reasons for your response.**

Positive.

<sup>10</sup> Transport Scotland (2015) Reported Road Casualties in Scotland 2015

<https://www.transport.gov.scot/media/20068/j436212.pdf>

<sup>11</sup> <http://www.20splenty.org/20Scotland>

As previously outlined, lower speed improves safety, and so will disproportionately benefit more vulnerable groups, many of whom are covered by protected characteristics.

Safer and less congested roads can help to reduce inequality by, for example, helping to make active travel more attractive. Failure to encourage lower traffic speeds could impact on equalities, as car use would continue to dominate and could force car use of those who cannot afford it<sup>12</sup>, if cars continue to be deemed the safest and only viable way of getting around.

The example of Edinburgh shows this to be the case, with the speed restrictions introduced not only improving safety, but also giving vulnerable road users greater confidence and improving their ability to easily and safely access the city centre.

**Question 9 – Could any negative impact of the Bill on equality be minimised or avoided?**

N/A

**Question 10 – Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?**

- Yes
- No
- Unsure

**Please explain the reasons for your response.**

N/A

**Question 11 – Do you have any other comments or suggestions on the proposal to establish a 20mph default speed limit on restricted roads?**

Overall, the aim of introducing speed restrictions to improve safety for people cycling must be supported by cycle-friendly traffic calming measures and/or quality street design and effective enforcement. Continued emphasis should be placed on investment to ensure there is safe, usable and accessible cycling infrastructure, such as segregated cycle lanes, to enable anyone, anywhere to cycle, and appropriate training programmes which promote safety and encourage behaviour change among all road users.

NICE (National Institute for Clinical Excellence) has recommended 20 mph speed restrictions as an effective way to improve air quality. NICE argues that by limiting unnecessary speeding up and slowing down in urban areas, 20 mph speed restrictions are highly effective and do not require physical measures, so are thus also highly cost-effective<sup>13</sup>.

The roll-out of 20 mph is supported by the public in Scotland. A recent poll found a majority (52.9%) in favour of making 20 mph the norm in urban areas, and one in four also said that lowering the speed limit would make them cycle and/or walk more for everyday journeys<sup>14</sup>.

<sup>12</sup> Muirie, J (2017) Active Travel in Glasgow: what we have learned so far. A Glasgow Centre for Population Health (GCPH) report [http://www.gcph.co.uk/assets/0000/6007/Active\\_travel\\_synthesis\\_final.pdf](http://www.gcph.co.uk/assets/0000/6007/Active_travel_synthesis_final.pdf)

<sup>13</sup> [http://www.20splenty.org/NICE\\_20mph\\_for\\_air\\_quality](http://www.20splenty.org/NICE_20mph_for_air_quality)

<sup>14</sup> [http://www.heraldscotland.com/news/15284751.New\\_poll\\_most\\_Scots\\_want\\_20mph\\_speed\\_limit\\_in\\_all\\_urban\\_areas/](http://www.heraldscotland.com/news/15284751.New_poll_most_Scots_want_20mph_speed_limit_in_all_urban_areas/)