

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

## Page 2: About you

Are you responding as an individual or on behalf of an organisation?

on behalf of an organisation

Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

*No Response*

Please select the category which best describes your organisation

Public sector body (Scottish/UK Government/Government agency, local authority, NDPB)

Please choose one of the following; if you choose the first option, please provide your name or the name of your organisation as you wish it to be published.

I am content for this response to be attributed to me or my organisation

Please insert your name or the name of your organisation. If you choose the first option above, this should be the name as you wish it to be published. If you choose the second or third option, a name is still required, but it will not be published.

Peter Craig, MRC/CSO Social and Public Health Sciences Unit, University of Glasgow

Please provide details of a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. We will not publish these details.

peter.craig@glasgow.ac.uk

## Page 7: Your views on the proposal

Q1. 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.

Partially supportive

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

There is some evidence from evaluations of reduced urban speed limits to suggest that lowering the default limit to 20mph would have beneficial effects on public health via a combination of reductions in the number of accidents and level of air pollution, and an increase in active travel. The strongest evidence relates to reductions in accidents, and even here the evidence is patchy: there is strong evidence that 20 mph zones with physical traffic calming measures reduce traffic speeds and accidents; the evidence that 20mph limit areas have such effects is much weaker, and derives from small local studies or from models of the relationship between traffic speeds, accidents and vehicle emissions, rather than from well-designed, adequately powered evaluations of the implementation of 20mph limit areas. This highlights the importance of coupling any extension of 20mph limits with a thorough programme of evaluation.

Q2. Could the aims of this proposal be better delivered in another way (without a Bill in the Scottish Parliament)?

Unsure

**Please explain the reasons for your response**

The current patchwork of 20mph limit areas suggests that national legislation for a default 20mph limit in built-up areas would have significant benefits in terms of extending coverage and reducing costs of implementation. The extent of these benefits will depend on how the legislation is implemented, how it is 'marketed' and enforced, the level of exemptions, and the behavioural response by road users. There are significant uncertainties around all of these factors, which underlies the need for a thorough evaluation if the Bill becomes law.

Q3. What do you think would be the main advantages, if any, of the proposal?

There is evidence to suggest there would be improvements in public health, via reductions in accidents and vehicle emissions and increases in active travel, but the evidence is not sufficient to make precise calculations of the size and nature of the improvement, especially in relation to changes in travel behaviour. It would be much more straightforward to identify the effects of a default national 20mph limit in built up areas than it is to measure the impacts of smaller local schemes.

Q4. What do you think would be the main disadvantages, if any, of the proposal?

There is a lack of evidence to suggest adverse impacts – but this does not mean we can be confident there are none, and this is something an evaluation would have to explore. There would be costs associated with implementation, and evaluation should include a cost-effectiveness or cost-benefit study to determine whether the benefits exceed the costs. Given the evidence that 20mph zones with physical traffic calming measures are effective, it is important that 20mph limit areas are not seen as a cheap alternative until their effectiveness is proven.

Q5. What other measures do you think would be needed to maximise compliance with the new national 20mph speed limit on restricted roads, for example in relation to advertising signage and police enforcement.

A review for the UK DfT of legislative measures to change the behaviour of drivers and other road users concluded that 'There have been considerable successes in changing behaviour based on strong enforcement of existing or new laws. This can apply even if the initial legislation was controversial, provided that there is a clear rationale, unambiguous tests of compliance, and a mood which reinforces legislation with social dis/approval. To make it an effective intervention, the behaviour required by the legislation should be unambiguous, easy to be monitored, policed and enforced, be within the competence of the individual to comply, have a clear rationale understood by the public, have a severe and multi-faceted penalty for non-compliance; and have an associated high probability that non-compliance will be detected.' (<http://www.dft.gov.uk/pgr/scienceresearch/social/behaviour-changes/pdf/transport-and-health.pdf>). This suggests that a combination of signage, social marketing and enforcement will be needed to maximise the benefits of a default 20mph limit.

Q6. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have?

	Significant increase in cost	Some increase in cost	Broadly cost-neutral	Some reduction in cost	Significant reduction in cost	Unsure
Scottish Government						X
Local Authorities						X
Motorists						X
Other						X
Police Scotland						

**Please explain the reasons for your response**

This is impossible to judge with any certainty. Estimating the costs and benefits of the legislation should be a key focus of evaluation.

Q7. Do you believe there will be any other benefits to reducing the speed limit from 30mph to 20mph?

*No Response*

## Page 14: Equalities

Q8. What overall impact is the proposed Bill likely to have on the following protected groups (under the Equality Act 2010): race, disability, sex, gender re-assignment, age, religion and belief, sexual orientation, marriage and civil partnership, pregnancy and maternity?

Unsure

**Please explain the reasons for your response**

We are not aware of any evidence relating to the impact of lower urban speed limits on protected groups. A recent review of the health effects of 20mph zones and limit areas concluded in relation to social inequalities that 'Whilst there [is] no direct evidence on the effects of interventions on health inequalities, targeting such interventions in deprived areas may be beneficial. Further controlled evaluations that specifically examine SES effects are required.' (Cairns J et al. Go slow: an umbrella review of the effects of 20 mph zones and limits on health and health inequalities. Journal of Public Health 2014; doi:10.1093/pubmed/fdu067). As national legislation would not be targeted on more deprived areas, estimating the effects on socio-economic inequalities in health should be a key focus of evaluation.

Q9. Could any negative impact of the proposed Bill on any of these protected groups be minimised or avoided?

As noted above (Q4), given the evidence that 20mph zones with physical traffic calming measures are effective in reducing accidents, it is important that 20mph limit areas do not 'crowd out' investment in 20mph zones, until the effectiveness of a default 20mph limit is proven.

## Page 16: Sustainability of the proposal

Q10. Do you consider that the proposed Bill can be delivered sustainably i.e. without having likely future disproportionate economic, social and/or environmental impact?

Yes

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

There is no evidence to expect substantial adverse economic, social or environmental impacts to occur, but these possibilities should be considered in designing evaluation.

## Page 17: General

Q11. Do you have any other comments or suggestions on the proposal to establish a 20mph default speed limit on restricted roads?

We have drawn attention to the lack of robust evidence for many of the benefits claimed for a default 20mph limit in built-up areas. This is particularly so for long term effects on drivers' and other road users' behaviour. Existing reviews tend to conflate the evidence for zones and limit areas, even though the effects are likely to differ quantitatively, or to rely on models rather than direct evidence from implementation studies. This is not to undermine the case for legislation, but to stress the importance of good evaluation, to inform both the implementation process and the case for retaining a lower speed limit if it proves to be an effective public health measure. There is substantial research capacity and expertise in Scottish Universities that could be drawn upon if required.