

# 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

Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)

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 If you choose the second or third option, a name is still required, but it will not be published.

Brake, the road safety charity

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.

## 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.

Fully Supportive

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.

**Please explain the reasons for your response**

Brake fully supports changing Scotland's current 30mph default speed limit on restricted roads to 20mph because it offers an opportunity to save lives, promote sustainable transport and improve the environment.

Excessive speed is a major contributory factor in road crashes, resulting in death and serious injury. In 2015, "travelling too fast for conditions" and "exceeding the speed limit" were contributory factors in 19% of fatal crashes and 11% of all reported road crashes in Scotland [1]. Excessive speed is also a significant problem for UK road traffic enforcement officers: in 2015-16 alone, 32% of Scottish motoring offences were classified as speeding offences (54,419 offences) [2].

At slower speeds, drivers have more time to identify potential hazards and take action to avoid them [3,4]. At 20mph, the average stopping distance is 12 metres, rising to 23 metres at 30mph according to the UK Highway Code [5], although new research from Brake/TRL suggests these distances are underestimated [6]. In addition, if a vehicle is travelling at a slower speed before a crash, the energy involved in the impact is much lower, and much less damage is caused by the crash [7].

As well as inflicting horrendous suffering, every road death is estimated to cost the economy £1.8 million [8]. Fewer casualties mean less strain on the NHS and emergency services, and less emotional and financial devastation for families [9]. A study in Wales suggested that introducing 20mph limits on roads classified as 30mph could prevent 6-10 road deaths and 1203-1978 casualties annually, saving an estimated £58-94 million per year in Welsh public health costs [10].

Reducing casualties isn't the only public health benefit of a default 20mph limit. Slower traffic speed makes people feel safer, which encourages more walking and cycling. Surveys of public attitudes towards traffic speeds carried out in Edinburgh before and after the implementation of a 20mph limit, showed that the percentage of respondents expressing a level of concern for traffic speeds fell from 32% in the 'before' survey to 24% in the 'after' survey. Analysis of cyclists' attitudes showed that they were significantly less likely to be concerned about traffic speeds after 20mph speed limits had been introduced [11]. In April 2013, the All-Party Parliamentary Cycling Group recommended the "widespread extension of 20mph speed limits as the default value in urban streets" to increase cycling [12]. More people walking and cycling means less motorised traffic on the roads and less pollution from vehicle emissions.

More walking and cycling means better health and prevention of illnesses like heart disease and diabetes, and greater savings for the taxpayer [13]. Lower speed limits can also help local businesses, especially in ailing town centres, by increasing footfall. In financial terms, the introduction of 20mph limits has widespread benefits and pays for itself many times over [14].

In short, there are numerous benefits to the introduction of a default 20mph limit where people live - including improved road safety, public health and sustainable transport, and less strain on the NHS and other public services.

**Footnotes**

[1] In 2015, 'travelling too fast for conditions' and 'exceeding the speed limit' were contributory factors in 19% fatal crashes and 11% road crashes in Scotland (RRC Scotland 2015, Transport Scotland, 2016, <https://www.transport.gov.scot/publication/reported-road-casualties-scotland-2015/>).

[2] Recorded crime in Scotland 2015-16, Scottish government, Group 7, 2016, <http://www.gov.scot/Publications/2016/09/2960/332789>.

[3] Average road crashes could fall by 4-6% per 1mph reduction in vehicle speed [Taylor, M. C., et al., The effects of drivers' speed on the frequency of road accidents, TRL, 2000, <http://www.20splentyforus.org.uk/UsefulReports/TRLReports/trl421SpeedAccidents.pdf>].

[4] Transport Scotland, Good practice guide on 20mph speed restrictions, 2016, <https://www.transport.gov.scot/media/6105/20-mph-good-practice-guide-19-december-2014-version-to-be-published.pdf>

[5] Department for Transport, UK Highway Code Rule 126: stopping distances, updated 2017, <https://www.gov.uk/guidance/the-highway-code/general-rules-techniques-and-advice-for-all-drivers-and-riders-103-to-158>

[6] Cuerden, R., The mechanics of emergency braking, Brake & TRL, 2017 <http://www.brake.org.uk/media-centre/1748-new-figures-show-highway-code-falls-short-on-stopping-distances>

[7] Khorasani-Zavareh D. et al, Kinetic energy management in road traffic injury prevention: a call for action, 2015, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4288294/>

[8] Department for Transport, Reported road casualties GB: Annual report 2015, 2015, RAS60001,

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.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/568484/rrcgb-2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/568484/rrcgb-2015.pdf)  
[9] Jones, S. & Brunt, H., Twenty miles per hour speed limits: a sustainable health solution to public health problems in Wales, British Medical Journal, 2017, <http://jech.bmj.com/content/71/7/699>  
[10] Jones, S. & Brunt, H., Twenty miles per hour speed limits: a sustainable health solution to public health problems in Wales, British Medical Journal, 2017,  
[11] City of Edinburgh Council, Before and After: Research into the implementation of 20mph speed limits in South Edinburgh, 2013, <http://www.niassembly.gov.uk/globalassets/documents/regional-development/road-traffic-speed-limits-bill/research-papers/final-20mph-after-study-report-v6-190913.pdf>  
[12] All-party Parliamentary Cycling Group, Get Britain Cycling, 2013, <https://allpartycycling.files.wordpress.com/2013/04/get-britain-cycling1.pdf>  
[13] Department of Health, Start Active, Stay Active: A report on physical activity from the four home countries' Chief Medical Officers, 2011, <https://www.gov.uk/government/publications/start-active-stay-active-a-report-on-physical-activity-from-the-four-home-countries-chief-medical-officers>  
[14] Living Streets, The pedestrian pound: business case for better streets and places, 2015, [https://www.livingstreets.org.uk/media/1391/pedestrianpound\\_fullreport\\_web.pdf](https://www.livingstreets.org.uk/media/1391/pedestrianpound_fullreport_web.pdf)

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

#### reasons for your response

Government is responsible for setting the country's speed limits and must take a central leadership role if the full benefits of 20mph speed limits (as outlined in our response) are to be realised. According to the World Health Organization: "Responsible and accountable road safety leadership at country, state, provincial and city level is essential. The OECD highlights the importance of leadership to achieve a paradigm shift towards a 'safe systems' approach to road safety [2]. Local authorities can play a key role in implementing 20mph limits and zones [3], but the introduction and enforcement of 20mph speed limits has been described as 'limited', with many local authorities lacking the resources and leadership to do so [4]. Evidence suggests that without central Government backing, the implementation of 20mph speed limits will be very difficult. Without legislative support, the process for introducing 20mph limits and zones to urban areas is too complex and expensive for many local authorities [5]. The implementation of a default 20mph speed limit and to reduce costs and confusion for local officials and Transport Scotland [6]. Footnotes: [1] WHO, Safe roads to sustainable development, 2017, <http://apps.who.int/iris/bitstream/10665/255199/1/9789241511704-eng.pdf?ua=1> [2] International transport forum, Zero deaths and serious injuries: a safe system, OECD, 2016, <http://www.oecd.org/publications/zero-road-deaths-and-serious-injuries-9789282108055-en.htm> [3] Parliament UK, Roads: the way forward, 2014, <http://researchbriefings.files.parliament.uk/documents/SN06013/SN06013.pdf> [4] Steer Davies Gleave, Research into the effectiveness of 20mph speed limits, 2014, <http://www.roadsafetyknowledgecentre.org.uk/downloads/20mph-reportv1.0-FINAL.pdf> [5] Transport Scotland has already implemented a 20mph scheme that covers 80% of the roads in the city centre (City of Edinburgh Council, Before and After: Research into the implementation of 20mph speed limits in South Edinburgh, 2013, <http://www.niassembly.gov.uk/globalassets/documents/regional-development/road-traffic-speed-limits-bill/research-papers/final-20mph-after-study-report-v6-190913.pdf>) [6] PACTS, Road safety since 2010, 2015, – indicates the need for consistent, government-led speed management policies instead of localised approaches. [http://www.pacts.org/assets/rac\\_foundation/content/downloadables/Road\\_Safety\\_Since\\_2010\\_Amos\\_Davies\\_Fosdick\\_PACTS\\_RAC\\_Foundation\\_final\\_report\\_S](http://www.pacts.org/assets/rac_foundation/content/downloadables/Road_Safety_Since_2010_Amos_Davies_Fosdick_PACTS_RAC_Foundation_final_report_S)

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

There are significant benefits to the proposal, outlined in our response to question 5, including improved road safety, public health and sustainable transport.

Urban areas and other residential areas should be places where anyone can travel unimpeded in a safe and pleasant environment. The introduction of default 20mph speed limits helps create shared spaces that are healthier, greener and safer [1]. Lower speed limits encourage people to be more active, cycling and walking and improving their fitness, health and wellbeing [2,3].

Reducing speed is a significant contributor to road crashes, and reducing speed offers a major opportunity to reduce road deaths and serious injuries, especially among vulnerable road users including cyclists, pedestrians and children [4] [5].

High traffic also has a negative impact on air quality, noise pollution levels and the 'liveability' of an area [6].

A 20mph speed limit suited to the local environment can result in smoother journeys with less vehicle idling, which contributes to air pollution; it's important to cut air pollution in places where people live and work, including residential areas and near schools and hospitals [7].

Slower traffic can also benefit the economically disadvantaged as low-income housing is often located close to busy roads; slower traffic means more people can live in their community without fear of the road [8].

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

N. et al, Achieving safety, sustainability and health goals in transport, PACTS, 2015, <http://www.pacts.org.uk/wp-content/uploads/sites/2/Achieving-safety-and-health-goals-in-transport-.pdf>

Health England, Working together to promote active travel: a briefing for local authorities, 2016, [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/523460/Working\\_Together\\_to\\_Promote\\_Active\\_Travel\\_A\\_briefing\\_for\\_local\\_authorities.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf)

S., Brunt, H. 2017 Twenty miles per hour speed limits: a sustainable solution for public health problems in Wales, Journal of Epidemiology and Health Care, [bmj.com/content/71/7/699](http://www.bmj.com/content/71/7/699)

s suggest that until the age of 14 children lack the cognitive reasoning to cross the road safely (Plumert, 2017, <https://now.uiowa.edu/2017/04/why-children-cannot-cross-busy-streets-safely>).

J, Boniface S, Watkins S. Health implications of transport planning, development and operations. J Transport Health, 2014;1:63–72

West, Essential evidence: No 159 What could a switch from 30mph to 20mph achieve across a whole country's population, 2017, [west.info/project/ee-no-159-switch-30-mph-20mph-achieve-across-whole-countrys-population](http://www.west.info/project/ee-no-159-switch-30-mph-20mph-achieve-across-whole-countrys-population)

ort and environment analysis group, An evaluation of the estimated impacts on vehicle emissions of a 20mph speed restriction in central London: final report, City of London College London, 2013, <https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/speed-restriction-report-2013-for-web.pdf>

A, Social factors in road safety: policy paper, 2012, <https://www.rospa.com/rospaweb/docs/advice-services/road-safety/social-factors-in-road-safety.pdf>

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

N/A

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 addition to advertising signage and police enforcement.

Scottish Government should introduce this policy with an educational/awareness-raising advertising campaign, supported by a nuanced, evidence-based safety strategy with targets to maximise driver compliance and road user safety [1-4]. A parallel crackdown on enforcement in selected 20mph areas, for example by police patrols and speed cameras is also required [5].

Notes:

WHO, Save LIVES: a road safety technical package, 2017, <http://apps.who.int/iris/bitstream/10665/255199/1/9789241511704-eng.pdf?ua=1>

International transport forum, Zero deaths and serious injuries: leading a paradigm shift to a safe system, OECD, 2016, [www.oecd.org/publications/zero-road-deaths-and-serious-injuries-9789282108055-en.htm](http://www.oecd.org/publications/zero-road-deaths-and-serious-injuries-9789282108055-en.htm)

Laburro, T. & Spencer, J., Seizing the opportunity: safer roads, PACTS, 2017, <http://www.pacts.org.uk/wp-content/uploads/sites/2/Safer-Roads.pdf>

Make, Inspire, inform, engage: Developing a pragmatic approach to road safety and sustainable transport interventions, 2017, [www.makebrake.org/assets/docs/Inspire-inform-engage-report\\_FINAL-Apr2017.pdf](http://www.makebrake.org/assets/docs/Inspire-inform-engage-report_FINAL-Apr2017.pdf)

Owen et al., The effectiveness of average speed cameras in Great Britain, RAC Foundation, 2016, [www.racfoundation.org/assets/rac\\_foundation/content/downloadables/Average\\_speed\\_camera\\_effectiveness\\_Owen\\_Ursachi\\_Allsop\\_September\\_2016.pdf](http://www.racfoundation.org/assets/rac_foundation/content/downloadables/Average_speed_camera_effectiveness_Owen_Ursachi_Allsop_September_2016.pdf)

## Page 12: Financial implications

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	Unknown
Scottish Government		X				
Local Authorities			X			
Motorists			X			

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

Other					X	
Police Scotland						

**Please explain the reasons for your response**

Scottish Government: Could experience an increase in costs during the initial stages of implementing a default 20mph limit, as repeater signs are removed (needed for 30mph zones). In the long-run, however, the government stands to make significant savings by preventing road deaths and serious injury. Fatalities cost Scotland £332.8 million in 2015; crashes resulting in serious injuries cost £351.9 million; and in total road crashes cost Scotland £1,130.2 million [1]. Local authorities: Could experience a slight increase in costs if they adapt the local road infrastructure to reflect the new limit or install speed cameras to enforce new speed limits [2]; however, local authorities will no longer have to spend money on repeater signs for 20mph zones [3] and the income generated from new speed cameras could be used to fund local road safety initiatives [4]. Motorists: A largely cost neutral group, although there are financial benefits of fewer crashes, more reliable journey times and associated costs [5]. Other road users: Could experience a significant reduction in cost. A smaller number of crashes means that fewer families are likely to experience the death of a salary-earning loved one in a road crash [6]. Public services: Reduction in costs due to emergency services call-outs to attend road crashes and treat victims. Lower speed limits could also encourage more people to engage with public transport options, potentially increasing local funding for these services [7]. Footnotes: [1] Reported Road Casualties: Scotland 2015, Transport Scotland, 2016, <https://www.transport.gov.scot/publication/reported-road-casualties-scotland-2015/> [2] City of Edinburgh Council's 20mph scheme covered 80% of the city and is estimated to cost £2.2 million (City of Edinburgh Council, Objections to Traffic Regulation Order TRO/15/17 20mph Speed Limit – Various Roads, Edinburgh Transport and Environment Committee, 2016). [3] Statutory instruments 2016 No.362: Traffic signs, regulations and general directions 2016, gov.uk, 2016, [https://www.legislation.gov.uk/uksi/2016/362/pdfs/uksi\\_20160362\\_en.pdf](https://www.legislation.gov.uk/uksi/2016/362/pdfs/uksi_20160362_en.pdf) [4] Owen et al., The effectiveness of average speed cameras in Great Britain, RAC Foundation, 2016, [https://www.racfoundation.org/assets/rac\\_foundation/content/downloadables/Average\\_speed\\_camera\\_effectiveness\\_Owen\\_Ursachi\\_Allsop\\_September\\_2016.pdf](https://www.racfoundation.org/assets/rac_foundation/content/downloadables/Average_speed_camera_effectiveness_Owen_Ursachi_Allsop_September_2016.pdf) [5] Department for Transport, Accident and casualty costs, RAS60, 2016, <https://www.gov.uk/government/statistical-data-sets/ras60-average-value-of-claiming-road-accidents> [6] Wedlock, E & Tapley, J., What works in supporting victims of crime: a rapid evidence assessment, 2016, <https://www.victimscotland.org.uk/wp-content/uploads/2014/10/What-works-in-supporting-victims-of-crime.pdf> [7] Transport for London, Safe streets for London: a road safety action plan for London 2020, 2013, <http://content.tfl.gov.uk/safe-streets-for-london.pdf>

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

Please refer to the responses to questions 5 and 7.

## 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?

Slightly positive

**Please explain the reasons for your response**

There is a significant body of evidence worldwide suggesting that people in disadvantaged socioeconomic groups are more likely to be involved in a road crash [1]. The introduction of a lower default speed limit could help disadvantaged groups by increasing road safety generally in the places where they work and live [2]. In addition, safer roads in communities would help make shared spaces more accessible to those with disabilities or limited movement due to illness or age [3]. Footnotes: [1] WHO, Global status report on road safety: 2015, 2016, [http://www.who.int/violence\\_injury\\_prevention/road\\_safety\\_status/2015/en/](http://www.who.int/violence_injury_prevention/road_safety_status/2015/en/) [2] Steinbach, R. et al., The impact of 20mph zones on inequalities in road casualties in London, British Medical Journal, 2011. [3] Living Streets, The pedestrian pound: business case for better streets and places, 2015, [https://www.livingstreets.org.uk/media/1391/pedestrianpound\\_fullreport\\_web.pdf](https://www.livingstreets.org.uk/media/1391/pedestrianpound_fullreport_web.pdf)

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

We do not consider there to be any negative impact.

## 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:**

The National Institute for Health Care and Excellence (NICE) has indicated that if 20mph speed limits are introduced incorrectly, there could be significant reduction in air quality [1]. But if changes are implemented responsibly and in line with an evidence-based strategy, we think that the benefits - in terms of improved road safety and encouraging people to take up more sustainable active travel, as outlined in our response to question 7 - outweigh the cost of implementing the Bill. In both financial and environmental terms, the cost of installing new road signs will be offset to some degree by the reduced need for 20mph repeater signs [2]; this will also result in reduced local government costs and 'decluttering' of residential road space. Footnotes: [1] NICE, Air Pollution: outdoor air quality and health, 2017, <https://www.nice.org.uk/guidance/ng70> [2] Statutory instruments 2016 No.362: Traffic signs, regulations and general directions 2016, gov.uk, 2016, [http://www.legislation.gov.uk/uksi/2016/362/pdfs/uksi\\_20160362\\_en.pdf](http://www.legislation.gov.uk/uksi/2016/362/pdfs/uksi_20160362_en.pdf)

## 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?

No