

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

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

SUBMISSION FROM CYCLING SCOTLAND

Cycling Scotland welcomes the opportunity to comment on the Restricted Roads (20 mph Speed Limit) (Scotland) Bill. Our key points are:

- Traffic speed and concerns over safety are two of the main barriers to people cycling. 20 mph can help to improve safety for people cycling and all road users.
- The Bill must be supported by effective enforcement and driver education and awareness raising, as well as speed reduction, to achieve the required level of culture and behaviour change whereby 20 mph becomes the norm in built-up areas. A combination of promotion, signage and effective enforcement is required to increase rates of cycling.
- Lower speeds not only improve safety, but also offer a range of other benefits including for the environment, health and economy.
- Local Authority and Police capacity constraints need to be addressed as part of the Bill and/or future legislation.
- Consideration of reduced speed on rural roads to 40mph, to protect vulnerable road users, especially those which contain on-road sections of the National Cycle Network (NCN). Such a measure would help to increase safety and promote increased modal shift to active travel.

Cycling Scotland is the nation's cycling organisation. Working with others, we help create and deliver opportunities and an environment so anyone anywhere 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.

Aim of the Bill

The accompanying Financial Memorandum to the Bill states that the aim of the Bill is to *“reduce vehicle speed and, by doing so, increase road safety, promote active travel and improve Scotland's local communities and wider environment”*. We believe that reducing default speed on restricted roads from 30mph to 20mph is a broadly effective way to achieve the aim of the Bill. The Bill must be able to clearly demonstrate how it is going to deliver lower speeds.

Concern over traffic travelling too fast is a significant barrier to cycling. Latest figures from the 2018 Annual Cycling Monitoring report highlight that such a concern was stated by 12.4% of people as a reason for not cycling. A further 18.2% of people identified too many cars on the road as a barrier¹.

Evidence shows that casualty rates are significantly higher in areas with a default 30mph speed limit, compared to those where traffic travels at 20mph. Over a four-year period, between 2012 and 2016, data shows that there were over 21 times

¹ Cycling Scotland (2018) Annual Cycling Monitoring Report
<https://www.cycling.scot/mediaLibrary/other/english/3028.pdf>

more casualties of all severities in areas with a 30mph speed limit compared to those with a 20mph limit².

Several studies have demonstrated a link between 20mph speed restrictions and a 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 40mph has a 31% chance of dying; if they are hit at 30mph, this falls to 7%; and at 20mph, the risk is negligible³. Also, lowering speeds 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, demonstrating a clear social justice impact of reducing speed⁴. There is also evidence that where a 30mph speed limit has previously been in place, lowering the limit to 20mph 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 rates⁵.

Further, evidence from the evaluation of Edinburgh's pilot 20mph scheme shows a significant increase in rates of cycling. Following the introduction of the scheme, three times as many children cycled to school than did before 20mph speed restrictions were introduced (from 4% to 12%)⁶.

Perception of safety is also significantly important and has been shown to be an important contributory factor in an individual's decision to cycle and/or walk. If an individual perceives that there has been a reduction in speed, even when there has not been, this contributes to them feeling safer and so makes them more likely to participate in active travel. Indeed, perception of speed has been shown to be a more important influencing factor for cycling and walking than actual speed⁷.

One of the main arguments often presented against 20mph speed restrictions is the longer journey time associated with reduced speed, and displaced traffic onto nearby roads. However, the argument of a longer journey assumes a like-for-like comparison between a 30mph and a 20mph journey. In reality, very few, if any, journeys through an 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 speeds⁸.

² Ibid

³ Cycling UK 20mph: lower speeds, better streets <https://www.cyclinguk.org/campaign/20-mph-lower-speeds-better-streets>

⁴ LGiU The Local Democracy Think Tank (2013) Area-wide 20mph neighbourhoods: a win, win, win for local authorities <https://www.lgiu.org.uk/wp-content/uploads/2013/12/Area-wide-20mph-neighbourhoods-a-win-win-win-for-local-authorities.pdf>

⁵ Dorling, D (2014) 20mph Speed Limits for Cars in Residential Areas, by Shops and Schools <https://www.thebritishacademy.ac.uk/publications/if-you-could-do-one-thing>

⁶ South Central Edinburgh 20mph Limit Pilot Evaluation; report to the Transport and Environment Committee for its meeting on 27th August 2013

⁷ Atkins, AECOM and Professor Mike Maher (2018) 20mph Research Study. Process and Impact Evaluation Headline Report, November 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757307/20mph-headline-report.pdf

⁸ Sarah Barth. 2013. Road.cc. Cycle commuters at an all-time high in Edinburgh, but across Scotland, car ownership is on the up'

Although welcome, a reduction in default speed to 20mph is not enough on its own to significantly increase levels of cycling (and walking) and so needs to be accompanied by other measures. Complementary measures like safe, segregated infrastructure, such as segregated cycle lanes and shared use paths, and driver education are required to achieve a notable increase in cycling (and other modes of active travel), and to maximise the effectiveness of reduced speed limits. There should be a combination of promotion, signage, and effective enforcement to maximise compliance. The exact combination of 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.

Overall, 20 mph speed restrictions can 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.

Other benefits of 20mph Speed Limit

We welcome recognition in the accompanying Policy Memorandum of the multiple other benefits of 20mph speed restrictions, particularly that result from encouraging and promoting modal shift to active travel.

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

Places with 20mph speed restriction(s) have higher rates of cycling, walking and public transport use. This helps create a more vibrant economy, and a higher quality environment for people to live in⁹. 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 benefit¹⁰. In terms of health, a research study has estimated the annual health economic impact to Glasgow accruing from cycle trips into and out of the city (in terms of reduced mortality) to be more than £4million¹¹. Findings from Bristol show that introducing speed restrictions in the city resulted in a 20.5% increase in cycling in the city¹². Further, evidence from Edinburgh, the first Scottish city to roll-out 20mph speed restrictions across the city centre, show that since 2009, rates of cycling have increased by a quarter. Most of this increase was between 8 am and 9 am when roads are traditionally at their busiest during the morning commute. Some 1,600

⁹ LGiU The Local Democracy Think Tank (2013) Area-wide 20mph neighbourhoods: a win, win, win for local authorities <https://www.lgiu.org.uk/wp-content/uploads/2013/12/Area-wide-20mph-neighbourhoods-a-win-win-win-for-local-authorities.pdf>

¹⁰ 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, page 11

¹¹ Glasgow Centre for Population Health (2018) GCPH Policy Briefing. The Potential Impact of a 20mph speed limit on urban roads in Scotland https://www.gcph.co.uk/assets/0000/6964/Policy_briefing_20mph.pdf

¹² LGiU The Local Democracy Think Tank (2013) Area-wide 20mph neighbourhoods: a win, win, win for local authorities <https://www.lgiu.org.uk/wp-content/uploads/2013/12/Area-wide-20mph-neighbourhoods-a-win-win-win-for-local-authorities.pdf>

people entered the inner city by bicycle during this time in November 2016¹³, demonstrating the significant impact that speed restrictions can have on rates of cycling and active travel.

Enforcement, Compliance and Communication

The most commonly expressed concern with 20mph speed restrictions is compliance, with many people feeling that the restrictions are not sufficiently enforced. In our response to the previous consultation on the proposed Bill, held by Mark Ruskell MSP, we highlighted concern about existing Police capacity to effectively enforce the new restrictions. This needs to be addressed before the Bill is implemented.

The multiple benefits that arise from reducing speed to 20mph will only be achieved if the policy is effectively and consistently enforced across the country. As stated in the accompanying Financial Memorandum to the Bill, there will be no changes made to Police Scotland's responsibility for enforcing the speed limit. Additional enforcement by way of speed checks by Police Scotland would likely be beneficial, at least in the short-term, to help deliver a meaningful shift in driver behaviour, although we note this is not a requirement of the Bill. Over time, as the 20mph speed limit becomes embedded, it is hoped that the need for enforcement action will reduce.

Local authorities have a role to play with regards to 20mph speed restrictions, both in terms of their operation and ensuring compliance with them. 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, 20mph limits require that a minimum of one repeater sign must be placed, unless the restriction is less than 200 metres. However, as the accompanying Policy Memorandum to the Bill outlines, the Bill is likely to have significant benefits for local authorities, in particular for those that have not yet implemented 20mph speed restrictions in their area. The default change of the speed limit to 20mph will mean that rather than having to declare a large area/number of streets as being 20mph, they will instead only have to declare a limited number of streets that will retain a 30mph speed limit, which is likely to be cheaper and less resource intensive. Some enforcement activity is likely still to be required in the period immediately following implementation, to ensure an appropriate level of compliance, which will have some cost associated with it.

We welcome the proposed commencement timescale outlined in the Bill of 18 months as this gives enough time for infrastructure changes to be made, such as installation of signage in areas/roads impacted, and for the public to understand what is happening and why, and the consequences of not complying. It is important that ahead of the introduction of the legislation, there is a national driver awareness raising campaign, supported by targeted enforcement and community level engagement, to complement infrastructure improvements. We emphasised this in our response to the Member's initial consultation. Both elements, alongside the lower speed, are necessary to instigate required levels of cultural change whereby lower speed becomes the norm. Evidence suggests that early engagement and buy-in

from stakeholders is essential to help minimise objections from the local community and to increase public acceptance of the new limit¹⁴.

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

Other

In reference to rural roads (and communities), often these roads are not restricted roads, and have a higher speed limit of around 50 or 60 mph, for example. The higher speed on these roads has a significant impact on the actual and perceived safety of vulnerable road users, including people cycling. Many rural roads in Scotland contain on-road sections of the National Cycle Network (NCN). With regards to this, it has been suggested that speeds should be lowered to 40mph on these roads to protect vulnerable road users. We believe this should be considered as part of the legislation or in accompanying legislation, to come into effect at the same time as the 20mph speed restrictions in the Bill, to ensure all vulnerable road users are protected right across the country, no matter where they live, and help ensure that everyone has access to opportunities and the wide range of benefits of active travel.

¹⁴ Ibid, page 7