

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

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

#### **SUBMISSION FROM EAST DUNBARTONSHIRE COUNCIL**

##### **Summary**

The Council broadly supports the general principle of the Bill and believes that the Bill could generate a number of benefits. These benefits include: road safety improvements, more attractive places for walking and cycling, reducing inequality and benefits for the local environment. Further analysis of the potential benefits is detailed in this response.

However, the Council also has a number of issues and concerns regarding the Bill and the additional costs that will be placed on local authorities following the provisions included in the Bill coming into force. These issues and concerns are also detailed within this response.

##### **Benefits**

###### ***Improved road safety for all road users***

Statistics released by the Department for Transport in September 2018 show that the average speed of a car on a 30mph road is 31mph. The same statistics show that the average speed of a car on a 20mph road is 26mph<sup>1</sup>. This shows that, in theory, a 5mph reduction in road speed on average could be achieved by reducing speed limits from 30mph to 20mph.

Research by TRL<sup>2</sup> concluded that a reduction in accident frequency of between 4-6% could be achieved per 1mph reduction in average speed. Therefore, it is probable that the Bill will reduce the frequency of accidents occurring. It is also probable that the Bill will reduce the severity of these accidents when they do occur, as statistics have shown that collisions that occur at lower speeds generally have less severe outcomes.

###### ***Improved road safety for the most vulnerable road users***

A study carried out by the Glasgow Centre for Population Health detailed that over the period 2013-2017, casualties on 30mph roads have accounted for 52% of all casualties in Scotland. Of these casualties, 25% were pedestrians and 11% were cyclists. This is a higher proportion of pedestrian and cyclist casualty rates than is currently recorded on roads with other speed limits. Furthermore, pedestrians and cyclists currently make up over 60% of serious or fatal casualties on 30mph roads in Scotland<sup>3</sup>.

---

<sup>1</sup> <https://www.gov.uk/government/statistical-data-sets/vehicle-speed-compliance-statistics-data-tables-spe#vehicle-speed-compliance-spe01>

<sup>2</sup> <http://www.20splentyforuk.org.uk/UsefulReports/TRLREports/trl421SpeedAccidents.pdf>

<sup>3</sup> Glasgow Centre for Population Health "The potential impact of a 20mph speed limit on urban roads in Scotland" September, 2018.

By looking at the statistics detailed above, it is likely that the Bill will have a particular positive effect on walkers and cyclists.

The reduction in speed on restricted roads will also have a positive effect on the most vulnerable road users including those who are visually impaired, have mobility issues and have other disabilities. It will increase the perception of safety, especially for crossing the road which can be quite hazardous for the groups of people mentioned above.

This would work towards achieving one of the objectives in the East Dunbartonshire Local Transport Strategy:

*“Delivering a safe transport network across all modes”.*

It would also work towards achieving the Council’s Local Outcome 4 identified in its Local Outcomes Improvement Plan<sup>4</sup>: *“East Dunbartonshire is a safe place in which to live, work and visit”.*

### ***Improved health through increased levels of walking and cycling***

In addition to the road safety benefits for the most vulnerable road users, the Council believes reducing road speeds will make walking and cycling more attractive as perceptions of safety are likely to be increased. Reducing road speeds was identified as an opportunity for increasing levels of active travel in the Council’s public consultation period for the East Dunbartonshire Active Travel Strategy 2015-2020. Improved opportunities for active travel is likely to result in increased health and wellbeing for residents of East Dunbartonshire. This would also deliver on the aims set out in the Active Travel Strategy, and the following objective of the Local Transport Strategy:

*“Improving the health and wellbeing of the community through promoting sustainable travel, attractive well designed streets and active travel routes throughout East Dunbartonshire”.*

It would also work towards achieving the Council’s Local Outcome 5: *“Our people experience good physical and mental health and wellbeing with access to a quality built and natural environment in which to lead healthier and more active lifestyles.”*

### ***Reducing inequality***

In general, the likelihood of pedestrian and cyclist casualties occurring is greater in more deprived areas compared to least deprived areas<sup>5</sup>. Therefore, the provisions included in the Bill may have a proportionally greater positive impact on those in society living in more deprived areas.

---

<sup>4</sup> <https://www.eastdunbarton.gov.uk/our-local-outcomes>

<sup>5</sup> Glasgow Centre for Population Health *“Trends in pedestrian and cyclist road casualties in Scotland”* August 2015

Improved conditions for walking and cycling can also help deliver a more inclusive society and ensure that the transport network can enable more people to travel safely to their destination, through the most sustainable modes.

### ***Improved road safety for key areas including schools, town centres and residential areas***

The Council believes that the Bill will deliver benefits to road safety in general but specifically support the benefits the Bill could bring to areas around schools, town centres and residential areas. The Council wants to see increased levels of active travel in general but specific focus is made on walking and cycling to school in the Council's Active Travel Strategy to ensure young people have improved levels of health and wellbeing. Reduced road speeds around residential areas and schools is likely to increase the perception of safety and encourage more young people and their parents to make this journey on foot or by bike.

This would work towards achieving the Council's Local Outcome 3: *"Our children and young people are safe, healthy and ready to learn"*.

Town centres are key commercial districts in East Dunbartonshire and the positive effect this Bill could have on road safety in and around these areas is welcomed. The perception of safety is extremely important in encouraging more people to visit these areas and the improved conditions for walking and cycling can also encourage more people to travel to these economic centres sustainably.

A recent study completed by Living Streets Scotland found that shoppers arriving on foot spend up to six times more than those who arrive by car<sup>6</sup>. Encouraging active travel to economic centres can therefore potentially increase footfall and economic spend by visitors.

This would work towards achieving the Council's Local Outcome 1: *"East Dunbartonshire has a sustainable and resilient economy with busy town and village centres, a growing business base, and is an attractive place in which to visit and invest"*.

### ***Environment and Air Quality***

Evidence shows that reducing vehicle speed also reduces the level of noise pollution. This has the ability to make a significant contribution to making streets and places nicer for people and to improve the quality of the environment.

Further research and evidence will need to be gathered to demonstrate the direct effect of 20mph speed limits on air quality through vehicle emissions. However, the Council believes that the benefits of making active travel more attractive could deliver positive results for local air quality by encouraging a modal shift for shorter journeys in our residential and town centre areas.

---

<sup>6</sup> <https://www.livingstreets.org.uk/highstreets>

## **Issues**

The Council does not agree that all restricted roads should be reduced to 20 mph. The key route corridors and distributor roads should retain the 30 mph speed limit. The Council understands that it will still be able to change the speed limit on restricted roads through the current Traffic Regulation Order process set out in Schedule 6 of the Local Authorities' Traffic Orders (Procedure) (Scotland) Regulations 1999. However, this will not follow the simplified procedure as described in the Bill. The Council believes this will add on additional costs to local authorities, both financially and in officer time. The Council welcomes the provisions in the Bill which allow revoking current 20mph Traffic Regulation Orders through a simplified procedure.

The provisions included in the Bill will also pass on significant expense to local authorities for changes to signage.

If the Bill progresses through the Scottish Parliament in its current form, the Council believes that, as this is a national change, additional funding should be set aside to assist local authorities' process this change in national legislation.

## **Awareness raising and enforcement**

The Council believes that an extensive national awareness raising campaign is required to inform people of the changes that the Bill is proposing. This would firstly let people know that the change is occurring but more importantly would help people understand what the transition is aiming to achieve and how they can contribute to the Bill's aims by reducing their speed to 20mph as they travel on restricted roads.

It would be more effective if this national awareness raising campaign was created with input and support from various national bodies which would then allow them to promote it through their channels, e.g. Road safety organisations, Police Scotland, Living Streets, Cycling Scotland, COSLA, etc. Interactive promotion can be especially engaging for social media and the use of social media has been used well in the past to promote a range of road safety campaigns such as 'Operation Close Pass'. The "Twenties Plenty" campaign is well known and could be refreshed and used effectively to promote a reduction in road speed on restricted roads.

Enforcement of the change in speed limit will rightly remain with Police Scotland. However, in order for the change in the restricted road speed limit to have its desired effect, there needs to be a programme of early enforcement/behaviour change actions from Police Scotland. This could take the form of an intense period of speed enforcement through the issuing of penalty points and fines. However, the Council believes that softer measures may have just as great an impact and reduce the costs associated for Police Scotland and the Procurator Fiscal Office. This could involve Police officers stopping vehicles they believe are breaking the new speed limit and firstly offering behaviour change education rather than enforcement at that time. Clearly the practicalities of this operation would have to be fully detailed prior to the provisions in the Bill coming into force.

## **Conclusion**

The Council broadly supports the general principle of the Bill and the objectives it is aiming to meet. This will provide a number of direct and indirect benefits to road safety, vulnerable road users and the environment. However, in order for the provisions in this Bill to be implemented successfully and for the Bill to have its desired effect, considerable support must be provided to local authorities that will require to cover the majority of the costs associated with this national change in speed limits for restricted roads.