

Response by PACTS to consultation by Mark Ruskell MSP, Green Party, on a Members Bill to change the default speed limit in built up areas across Scotland from 30mph to 20mph.

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The Parliamentary Advisory Council for Transport Safety (PACTS) is a UK-wide transport safety body which works with governments, parliamentarians and key stakeholders. PACTS advocates evidence-based policies to reduce transport casualties, and to meet associated objectives such as sustainability. PACTS supports the safe system approach to road safety. Established in 1981, PACTS is a founder of the European Transport Safety Council. ([More about PACTS.](#))

PACTS welcomes this consultation. 20mph speed limits are an important road safety topic of debate at present. There is sometimes more heat than light and a careful examination of the issues and evidence are needed.

PACTS does not support a change in the default speed limit in built up areas from 30mph to 20mph. This is for the following main reasons:

- The experience of introducing 20mph limits *without physical measures to enforce lower speeds* has resulted in very limited reductions in speeds – less than 1mph in average speeds;
- Because the changes in speeds are so small, and largely imperceptible to most road users, the other benefits (eg more active travel, reduced vehicle emissions etc) have not resulted;
- Where speeds remain around 30mph in newly created 20mph areas, this undermines speed limits and the credibility of police enforcement, is confusing for road users and can lead to adverse behaviour.

PACTS strongly supports the principal of lower driven speeds (close to 20mph) in built up areas as part of a wider safe system approach to road safety and to associated objectives. Unfortunately, evidence shows this requires more than simply changing the default speed limit. Driven speeds should not be confused with speed limits.

For roads where average speeds are around 20-25mph, reducing the speed limit (without physical measures) tends to reduce average speeds by up to 1mph. Although this change in speed is small and generally not perceived by users, but it can be expected to deliver a modest reduction in casualties of around 5%. It will almost certainly not result in general compliance with the new 20mph limit but this is a safety improvement and, arguably, speeds close to 20mph are acceptable.

On roads where average speeds are closer to 30mph, reducing the speed limit from 30mph to 20mph should also result in a small downward movement in average speeds and, more importantly, in the speeds of the fastest vehicles. This should also deliver some casualty reduction benefits. However, PACTS is concerned that on roads where 20mph is not seen as realistic by drivers, and no effective measures (engineering or safety cameras) are taken to enforce the new limit, driven speeds

continue to be close to 30mph. Motorists soon realise that nothing has really changed and vulnerable road users find there is no tangible benefit. Tolerating speeds well in excess of the 20mph limit brings the speed limit regime into disrepute.

Making speed limits effective

The 20mph zones (20mph limits enforced by road layout or engineering measures) were widely introduced and evaluated in the UK in the 1990s and 2000s. They were proven to have substantial speed and casualty reduction benefits. Because of cost and some problems caused by road humps (particularly for buses) it has not been possible to introduce 20mph zones across the urban area. However, this does not mean that the same benefits can be achieved simply by changing the signs.

Levels of roads policing have been reducing across the UK for a decade or more. PACTS strongly deplores this and supports higher levels of policing and better use of technology. However, it is unrealistic to expect any significant change or for the police to be able to devote more than occasional attention to 20mph limits. As such, engineering measures are essential if reasonable compliance and tangible benefits are to be achieved on roads where speeds are closer to 30mph.

Community engagement, publicity and education can help to create an acceptance of engineering and enforcement measures but do not themselves deliver behaviour change.

The London Mayor's Draft Transport Strategy – currently out for consultation – supports widespread 20mph limits as an important element in delivering healthy streets and vision zero for road casualties. However, the strategy makes clear – and TfL are quite aware – that limits alone will not deliver and need to be backed by substantive action. These actions involve street redesign, intelligent speed assistance (ISA) for buses and other vehicles, camera enforcement and more.)

PACTS believes speed limit changes should come about as a result of local decision-making, not imposed centrally. For 20mph limits to have meaningful outcomes, the local roads authority, police and community will need to be actively engaged and reinforce changes in speed limits with a range of engineering, enforcement and educational measures. This will also involve deciding which, if any, roads are to remain at 30mph. This is a process that requires political commitment, technical assessment, planning and resources.

We are concerned that, too often, changing the speed limit is seen as “job done” when it is only the start.

Review the evidence

PACTS urges the Green Party and the Scottish Government to look closely at the research evidence, such as exists, and not to rely on wishful thinking and unsubstantiated claims.

PACTS has carefully reviewed the research, particularly the evidence the outcomes, of 20mph limits. The following is apparent:

- The benefits of lower driven speeds limits are often conflated with the claimed benefits of lower speed limits;
- 20mph limits (signs only) are often confused with 20mph zones (self-enforcing);
- Robust evaluation is not easy and there is a paucity of good quality research. (See Atkins study below.) However, virtually all the studies reach similar findings: that changes in speeds are very modest – around 1mph for average speeds and slightly more for the fastest vehicles.
- European experience (30kph) supports the results from the UK.
- There is no evidence of changes in active travel as a result of 20mph limits. (That is not to say that lower speed limits are unhelpful, but that, without other measures, they do not deliver change.)
- There is no evidence that 20mph limits improve air quality. (PACTS has explored the two exploratory papers on this issue and both authors are clear that they predict no worsening, but not improvement.)

The study by Atkins for the Department for Transport – due for publication shortly – will be the most comprehensive and robust study to date. It includes very detailed and accurate data on changes in speeds. Interim data on speeds and road user attitudes has been published.¹ It shows modest reductions in speeds which are not noticed by the majority of local people. Although people generally approve of the change to 20mph there is no evidence of behaviour change. The final report, with casualty data, is due around the end of the year. A similar study has recently been commissioned by Public Health Scotland.

PACTS believes the Atkins study will be extremely important and will review its position on 20 mph limits in the light of its findings.

¹¹ See briefing on PACTS website <http://www.pacts.org.uk/2017/08/atkins-research-on-20mph-limit-areas-interim-results/>